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ABSTRACT

This report represents the final attempt by outgoing Commissioner Nicholas Johnson to draw attention to the Federal Communications Commission's (FCC) automatic renewal of licensees guilty of substandard performance. The report analyzes the performance of network affiliates in the top 50 television markets with respect to programing, female and minority employment, and ownership. It seeks to demonstrate the kind of analysis which can be made, to develop minimum standards, and to design an alternative to government regulation by using public disclosure of information to spur the industry to improve its performance and to motivate the public to challenge substandard licensees. The analyses of performance are based upon public data supplied by licensees to the FCC; in three separate chapters criteria on programing, employment, and ownership are developed from inspections of the data and the stations are rank-ordered according to their performance. A fourth chapter discusses what citizens can do to improve television in their community. Six appendixes and 17 tables provide detailed data on approximately 150 stations. (PB)

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Because Broadcasting in America was issued as a dissenting opinion to the 1973 Arkansas, Louisiana, and Mississippi License Renewals while I was serving on the Federal Communications Commission, it is printed in the official F. C. C. Reports. You may order additional copies of Broadcasting in America for the cost of having them printed (\$1.75 each). Just write: Superintendent of Documents, Government Printing Office, Washington DC 20402. Ask for "F. C. C. Reports, Volume 42 (Second Series), Number 1, August 10, 1973." (Needless to say, I have no financial interest in the publication.) I hope you find Broadcasting in America useful, and that you will send me your comments, suggestions for improving future volumes, and the results of any comparable studies you may do on broadcasting in your community.

Nicholas Johnson
P. O. Box 19101
Washington DC 20036

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BROADCASTING IN AMERICA
The Performance of Network Affiliates
in the Top 50 Markets

*July 1973—A case study prepared by FCC Commissioner Nicholas
Johnson and his staff and seminar students*

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C. 20554

In Re Renewals of
BROADCAST LICENSES FOR ARKANSAS, LOUISIANA
AND MISSISSIPPI, 1973

MAY 31, 1973.

THE COMMISSION BY COMMISSIONERS BURCH (CHAIRMAN), ROBERT E. LEE, H. REX LEE, REID, WILEY, AND HOOKS, WITH COMMISSIONER JOHNSON DISSENTING AND ISSUING A STATEMENT, APPROVED STAFF ACTION REVIEWING BROADCAST LICENSES FOR ARKANSAS, LOUISIANA AND MISSISSIPPI FOR 1973.

DISSENTING OPINION OF COMMISSIONER NICHOLAS JOHNSON

For my entire term I have dissented to the automatic renewal of licensees guilty of substandard performances in programming and (more recently) employment. The 1973 Arkansas-Louisiana-Mississippi renewals represent the last group that will cross my desk during my official tenure as Federal Communications Commissioner. Therefore, I and my staff and seminar students have prepared a major report on broadcasting in America, incorporating many of the complaints and suggestions of my seven years, for this one final renewal dissent.

42 F.C.C. 2d

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CREDITS

This report is very much the product of a multi-group effort. The groups involved included my own staff, a group of Georgetown University law students in a seminar I was teaching, FCC employees outside of my office, and guests appearing before the seminar.

After the markets and stations were selected, decisions had to be made as to which categories of data to include and exclude, and the analyses to which they should be subjected. The data had to be extracted from FCC files. Computer programs were written. Additional research, writing and editing produced the text. The text and charts were laid out and typed many times. Each of these tasks involved uncounted hours of labor.

The principal participants in my own office were Larry Gage and Elaine Weiss. It was they who did the lion's share of the administration of the group effort, following up on the thousands of details necessary to the project's timely completion, editing the seminar students' contribution, and adding their own substantial segments of text. Karen Possner, a doctoral candidate in Communications at the University of Iowa, made valuable contributions to the seminar sessions and this report. Chuck Shepherd helped out with some of the charts. Bonnie Herbert and Karen Margrave bore the considerable burdens of typing and preparing this substantial manuscript at a time when their normal tasks were especially heavy.

The Georgetown law students were: Phil Argento, Thomas J. Collin, Raymond C. Fay, Ronald G. Gabler, Larry Harbin, Karen B. Possner, Lucilla A. Streeter, James R. Tanfield, David Wagner, James B. Wilcox, Jr. and Brady Williamson. They participated in my seminar with the advance knowledge that the burdens would be substantial and executed the assignment with great ability and good spirits. Derrick A. Humphries participated in the first two months of the seminar. The contribution of Larry Harbin in preparing and executing our computer programs warrants special mention.

Those FCC employees outside of my office who gave us invaluable assistance include: Pearl Cook, Larry Eads, John Foret, Alex Korn, Quentin Proctor, Allan Stillwell, Wally Johnson, David Westin and Harold Kassens. We very much appreciate their cooperation—occasionally requiring their staying well beyond the FCC's normal 4:30 p.m. closing time.

Seminar guests who gave us an evening of their time included: Sam Buffone, a former seminar student and currently an associate in Stern Concern; former FCC Commissioner Kenneth A. Cox; former FCC General Counsel Henry Geller, currently with the Rand Corporation; Dr. Everett Parker, Director of the United Church of Christ Office of Communications; Tracy Westen, a former legal assistant of mine and currently Director of Stern Concern; and Dr. Clay T. Whitehead, Director of the White House Office of Telecommunications Policy—as well as most of the FCC employees mentioned above. Each contributed in his or her own way to the seminar participants' understanding of the performance and regulation of broadcasting in America.

The other friends and advisors who have had some input during the past seven years to my thinking about broadcast regulation in general

and this approach to it in particular are too numerous to itemize but are no less important to the end product.

With thousands of pieces of data copied and handled many times, there are undoubtedly errors somewhere in this report. All I can say is that we have done our best to keep such errors to an absolute minimum and express our regrets in advance to any broadcaster who has been adversely affected by such error.

NICHOLAS JOHNSON,
Washington, D.C.

June 1973

INTRODUCTION

The revelations surrounding Watergate have only dramatized what many concerned citizens and public interest lawyers have known for a long time: we cannot rely on government to solve our problems. The regulatory agencies set up to serve the public interest all too often end up almost totally subservient to industry pressure.

Whatever may be the case elsewhere, however, the Federal Communications Commission is a classic case of what now Chief Justice Burger once called "a curious neutrality in favor of the licensee."¹

Seemingly congenital pro-industry bias, of course, is no reason to give up on the agency. Quite the contrary. It must be watched all the more closely. There must be appeals to the courts and Congressional and press exposes of the FCC's most egregious decisions. There must be public participation in license renewal hearings, fairness doctrine complaints, FCC rule makings, Congressional hearings involving the agency, and so forth. Still, it is only the better part of wisdom and imagination to try to come up with alternatives to government at the same time efforts are being made to maximize the potential of the FCC.

One such alternative is represented by this report. It is, quite simply, an effort to use public disclosure of broadcasters' performance, and comparative rankings of those broadcasters, as a means of rewarding the better stations and punishing the worst.

It is true, of course, that this analysis of what is, after all, FCC data, may attract the attention of FCC staff or Commissioners, or may provide an incentive to outraged citizens to file license renewal challenges against the worst stations. This report may be more seriously considered by broadcasters because they are aware of that potential threat. But that is not the principal purpose of the report. The major hope is simply that the mere publishing of this data will, standing alone, provide reinforcement for the better stations and an incentive to improvement by the worst.

It is true that an FCC Commissioner was involved in the preparation of this document. But in many ways that should be irrelevant to its impact. The data used is publicly available from the FCC's files. And broadcasters have little to fear from the vote of one dissenting Commissioner on a seven-person Commission. In short, this is the kind of study that any group should be able to do—nationally, as this one, or locally, and in more depth.

This report represents the attempt of one Commissioner, his staff, and seminar students to analyze the performance of each of the net-

¹ *Office of Communication of the United Church of Christ v. Federal Communications Commission*, 359 F.2d 994 (D.C. Cir. 1966).

work affiliates in the top fifty television markets in the country. Because the findings are presented in the form of *rankings* of those stations, in areas of performance from employment to programming, it is perhaps fitting to begin the report with the overall composite ranking of the affiliates with regard to their programming performance.

Quite simply, this table ranks each of the stations in the study based on a composite of *all* of the programming criteria analyzed in Chapter one. In this table KPIX-TV, San Francisco, ranks as the best-programmed station in the top fifty markets, and WCCB, Charlotte, N.C., ranks as the worst.

TABLE 1.—Network affiliates ranked by composite of all programming criteria

Rank	Call letters	Net. aff.	Mkt. No.	Location
1	KPIX	CBS	8	San Francisco
2	WJZ	ABC	19	Baltimore
3	KING	NBC	16	Seattle-Tacoma
4	KDKA	CBS	9	Pittsburgh
5	KYW	NBC	4	Philadelphia
6	WPLG	ABC	18	Miami
7	WMAL	ABC	10	Washington D.C.
8	WTAE	ABC	9	Pittsburgh
9	WFMY	CBS	48	Gnsb-High Pt-Win Sal
10	KGW	NBC	26	Portland
11	WWL	CBS	31	New Orleans
12	WRC	NBC	10	Washington D.C.
13	WABC	ABC	1	New York City
14	KNBC	NBC	2	Los Angeles
15	WHC	NBC	9	Pittsburgh
16	WTIC	CBS	22	Hartford-New Haven
17	WNAC	ABC	6	Boston
18	KATU	ABC	26	Portland
19	WHAS	CBS	36	Louisville
20	KCRA	NBC	27	Sacramento-Stockton
21	KOIN	CBS	26	Portland
22	WBNS	CBS	28	Columbus
23	KTAR	NBC	45	Phoenix
24	KOMO	ABC	16	Seattle-Tacoma
25	WLWT	NBC	20	Cincinnati
26	WCBS	CBS	1	New York City
27	KMOX	CBS	12	St Louis
28	WSM	NBC	30	Nashville
29	WKY	NBC	41	Oklahoma City
30	WAST	ABC	37	Albany-Schenectady-T
31	WSB	NBC	17	Atlanta
31	WBZ	NBC	6	Boston
33	KSL	CBS	50	Salt Lake City
34	WMAR	CBS	19	Baltimore
35	WZZM	ABC	41	Kalamazoo-Gr Rapids
36	WDSU	NBC	31	New Orleans
37	WRTV	NBC	14	Indianapolis
38	WBFN	CBS	25	Buffalo
39	WNBC	NBC	1	New York City
40	KNXT	CBS	2	Los Angeles
41	KPRC	NBC	15	Houston
42	WCPO	CBS	20	Cincinnati
43	WMAQ	NBC	3	Chicago
44	KOVR	ABC	27	Sacramento-Stockton
45	WITI	ABC	21	Milwaukee
46	WCAU	CBS	4	Philadelphia
47	WSYR	NBC	43	Syracuse
48	WBAL	NBC	19	Baltimore
49	WBRC	ABC	38	Birmingham
50	WPVI	ABC	4	Philadelphia
51	WPRI	CBS	34	Providence
52	WAPI	NBC	38	Birmingham
53	KUTV	NBC	50	Salt Lake City
54	KWTV	CBS	41	Oklahoma City
55	WTOP	CBS	10	Washington D.C.
56	WCKT	NBC	18	Miami
57	WSOC	NBC	35	Charlotte
58	WOAI	NBC	45	San Antonio
59	KSTP	NBC	13	Minneapolis-St Paul
60	WAGA	CBS	17	Atlanta
61	WSIX	ABC	30	Nashville
62	WOTV	NBC	41	Kalamazoo-Gr Rapids
63	WXII	NBC	48	Gnsb-High Pt-Win Sal
64	KTRK	ABC	15	Houston
65	WLWI	ABC	14	Indianapolis
66	KSD	NBC	12	St Louis

TABLE 1.—Network affiliates ranked by composite of all programming criteria

Rank	Call letters	Net. aff.	Mkt. No.	Location
66	WTVJ	CBS	18	Miami
68	KTVI	ABC	12	St Louis
69	WWJ	NBC	5	Detroit
70	KHOU	CBS	15	Houston
71	WLCY	ABC	24	Tampa-St Petersburg
72	WFBC	NBC	40	Gville-Sptnbg-Ashvi
73	WKBW	ABC	25	Buffalo
74	WTMJ	NBC	21	Milwaukee
75	WBBM	CBS	3	Chicago
76	KGO	ABC	8	San Francisco
77	WJW	CBS	7	Cleveland
78	KSAT	ABC	45	San Antonio
79	WVUE	ABC	31	New Orleans
80	WTVT	CBS	24	Tampa-St Petersburg
81	WAVY	NBC	44	Norf-Newp News-Hamp
82	WBTW	CBS	35	Charlotte
83	WLWD	NBC	39	Dayton
84	WCCO	CBS	13	Minneapolis-St Paul
85	WFAA	ABC	11	Dallas-Fort Worth
86	WLAC	CBS	30	Nashville
87	KCMO	CBS	23	Kansas City
88	WTEV	ABC	34	Providence
89	WMC	NBC	29	Memphis
90	WTEN	CBS	37	Albany-Schenectady-T
91	KOCO	ABC	41	Oklahoma City
92	WLKY*	ABC	36	Louisville
93	WBAP	NBC	11	Dallas-Fort Worth
94	WJAR	NBC	34	Providence
95	WTNH	ABC	22	Hartford-New Haven
96	KFMB	CBS	49	San Diego
97	KTVK	ABC	45	Phoenix
98	WTOL	CBS	45	Toledo
99	KMGH	CBS	32	Denver
100	WDHO*	ABC	45	Toledo
101	KDFW	CBS	11	Dallas-Fort Worth
102	KABC	ABC	2	Los Angeles
103	WHNB*	NBC	22	Hartford-New Haven
104	WISH	CBS	14	Indianapolis
105	KXTV	CBS	27	Sacramento-Stockton
106	WAVE	NBC	36	Louisville
107	WNYS	ABC	43	Syracuse
108	WHEN	CBS	43	Syracuse
109	KCPX	ABC	50	Salt Lake City
110	WHTN	ABC	33	Charleston-Huntingto
111	WLOS	ABC	40	Gville-Sptnbg-Ashvi
112	KGTW	NBC	49	San Diego
113	KOA	NBC	32	Denver
114	KIRO	CBS	16	Seattle-Tacoma
115	WLS	ABC	3	Chicago
116	WKYC	NBC	7	Cleveland
117	WXYZ	ABC	5	Detroit
118	WRGB	NBC	37	Albany-Schenectady-T
119	WSPD	NBC	45	Toledo
120	WKRC	ABC	20	Cincinnati
121	WCHS	CBS	33	Charleston-Huntingto
122	KNSP	ABC	13	Minneapolis-St Paul
123	WGR	NBC	25	Buffalo
124	WSAZ	NBC	33	Charleston-Huntingto
125	WEWS	ABC	7	Cleveland
126	WHIO	CBS	39	Dayton
127	WFLA	NBC	24	Tampa-St Petersburg
128	WREC	CBS	29	Memphis
129	WSPA	CBS	40	Gville-Sptnbg-Ashvi
130	KENS	CBS	45	San Antonio
131	WLWC	NBC	28	Columbus
132	WISN	CBS	21	Milwaukee
133	WJBK	CBS	5	Detroit
134	WDAF	NBC	23	Kansas City
135	KMBC	ABC	23	Kansas City
136	WTVN	ABC	28	Columbus
137	WVEC	ABC	44	Norf-Newp News-Hamp
138	WKZO	CBS	41	Kalamazoo-Gr Rapids
139	WBMG*	CBS	28	Birmingham
140	KOOL	CBS	45	Phoenix
141	WUBQ	ABC	29	Memphis
142	KBTW	ABC	32	Denver
143	WQXI	ABC	17	Atlanta
144	WCCB*	ABC	35	Charlotte

*Denotes UHF network affiliate.

This report represents an effort to do more than just charge the Commission once again with the refusal to develop any positive standards for the performance of its broadcast licensees. Such charges have often been made, in any different forums. This is an effort to demonstrate the type of analysis that *could* be made of the available indicia of a licensee's performance prior to the renewal of its right to profit from the public airwaves.

The Commission has often been confronted with the opportunity to develop minimum standards in areas of programming, ownership and employment. Each time those standards have either been rejected or thoroughly emasculated by the Commission majority.² When former Commissioner Kenneth A. Cox was Chief of the Broadcast Bureau, he sent letters to stations with percentages of news and public affairs programming below certain minimum levels—a practice swiftly ended by the full Commission.

The major problem seems to arise from the broadcasters' (and most Commissioners') refusal to accept the fact that there is most emphatically a difference between censorship of programming, which the Communications Act of 1934 specifically prohibits,³ and assurance of adequate levels of service in areas important to the listening or viewing public regardless of the subject matter or content of the programming presented.⁴

When Kenneth Cox was an FCC Commissioner he attempted to come up with some method at license renewal time for determining whether or not a licensee had adequately served the public interest—or whether it deserved further inquiry because of poor performance. One simple standard used the data available on the license renewal form. It merely required the licensee to demonstrate that 5% of its program week had been devoted to news, 1% to public affairs, and 5% to "other" non-entertainment programming (which came to be known as the "5-1-5" standard)—far too low, especially for television licensees.

Other approaches were also tried. The occasion of the Oklahoma renewals (all the licenses in any given state expire at the same time) was used to do a book-length study of broadcasting in the state of Oklahoma, describing the communities in detail, noting the various sources of information available, from print as well as broadcast media, and generally describing the performance of the licensees seeking renewal at that time.⁵

Later, in the state of New York,⁶ and for the renewals processed jointly from Washington, D.C., Maryland and Virginia,⁷ still another

² The most celebrated, of course, was the 1946 "Blue Book," Part II, which attempted for the first time to set minimum standards for service to the public; it did not last the decade. It is reprinted in F. Kahn, ed., *Documents of American Broadcasting* 141-146 (rev'd. ed. 1972). Most recently, former Commission General Counsel Henry Geller proposed a minimum level of performance below which a broadcaster would be questioned at renewal time; his proposal—that broadcasters program at least 15% local, 10% news and 5% public affairs, both overall and in prime time—was never seriously considered by the Commission majority.

³ 47 U.S.C. § 326.

⁴ For an excellent exclamation of the broadcaster's point of view, see Kalven, "Broadcasting, Public Policy and the First Amendment," 10 J. Law & Econ. 15 (1967).

⁵ *Renewal of Standard Broadcast and Television Licenses, an Oklahoma Case Study*, 14 F.C.C. 2d 1 (1968).

⁶ *Renewal of Standard Broadcast and Television Licenses*, 18 F.C.C. 2d 268, 269, 322 (1969).

⁷ *Renewals of Standard Broadcast and Television Licenses*, 21 F.C.C. 2d 35 (1969).

approach was used. Stations were ranked by the criteria available from their license renewal form—news and public affairs, the number of public service announcements, and so forth—in a manner that is similar in some ways to the procedure of this larger study of network affiliates.

The impact of each of these efforts upon the Commission was minimal, although it has recently adopted a badly-needed new renewal application which somewhat improves the quality of the data collected from licensees.⁸ It has not, however, acted favorably on any proposals for minimum standards on that information.⁹

The impact upon the industry, however, has been somewhat more significant, and has been a motivating factor in this study. For example, even though broadcasters and their lawyers know that a failure to meet the 5-1-5 standard will have no effect whatsoever upon license renewals, they are increasingly programming to meet those standards if only because they dislike even the minimal adverse attention of a dissenting opinion buried deep within the official FCC Reports. When the New York and Washington studies were published, broadcasters were quite pleased to attract public and advertiser attention to their high ratings—and very quick to call Commissioners' attention to any miscalculation that resulted in even a slightly lower rating than they felt they deserved.

In attempting to mount a project that would have an effect on as wide a segment of American broadcasting as possible, there has been great selectivity in both the stations chosen and the criteria used. It would have been impossible to evaluate each and every one of the more than 8,000 radio and television stations in this country. First, television was chosen over radio, because its influence is more widely felt and also, quite frankly, because it was an easy way to eliminate the vast majority of licensees at the outset. The 50 largest television markets in the country were selected from among the some 12,000 communities in the United States, because they contain more than 65% of the American population and constitute the most "cost effective" focus.¹⁰ The "top 50" have often been selected by the FCC as a natural break in its broadcasting regulations. Finally, the three network affiliates in each market were selected (rather than including independent television stations as well) because those are the choice of roughly 85%

⁸ *In the Matter of Formulation of Rules and Policies Relating to the Renewal of Broadcast Licenses*, Docket No. 19152, FCC 73-451 (May 4, 1973).

⁹ For example, see the Henry Geller proposal discussed in note 2 *supra*.

¹⁰ The "top 50 markets" used in this study were determined on the basis of the most recent rankings by the American Research Bureau, published in ARB's 1972 *Television Market Analysis* on November 20, 1972. No more current data will be published until after September 1, 1973. The market's rank is determined according to the average number of households reached from 9 a.m. to midnight within a survey area. Survey areas are the geographic areas comprised of those counties in which ARB estimates 98% of the net weekly circulation of home market stations occurs. Because the average number of households is reported by thousands, two markets are tied for the 41st rank and three are tied for the 45th. Accordingly, we list no 42nd, 46th or 47th rank.

The only exception to ARB's top 50 markets was our deletion of Wilkes Barre-Scranton, which would have been number 49, from our study and the concomitant elevation of Salt Lake City, otherwise market number 51. This was done because we felt it unfair to compare the results in Wilkes Barre-Scranton, an all-UHF market, with those of its VHF competitors, even though we retained five markets in which one network affiliate broadcasts on UHF (they are appropriately identified in the rankings).

The top 50 markets include parts of some 43 different states and help send over 82% of the members of the House of Representatives to Congress.

of the nation's viewers at any given moment.¹¹ Moreover, as they tend to have the largest revenue of any stations in the industry, one can fairly hold them to the highest standards. Theoretically, then, that produces a population of some 150 stations (three network affiliates in each of 50 markets). However, factors intervened to reduce the final sample to 144, although for some purposes (such as employment there was information available on 147.¹²

¹¹ That is not to say there aren't a few enormously successful independents that should have been included in a study of America's biggest broadcasters. However, we felt we had to draw the line somewhere, and we could not have justified the inclusion of independents in less than all the top 50 markets.

¹² Three network affiliates located in the top 50 markets were eliminated from our study. Three additional stations were excluded from the over-all ranking and public service announcement portions of our report, but were included in the employment and ownership portions. The details are listed below:

Call sign	KSCT
Channel	39
Affiliation	ABC
City	San Diego
Market number	49
Excluded from	Entire Study
KSCT became San Diego's ABC affiliate early this year. Prior to this, XETV, a Mexican station, was the ABC affiliate. The Commission has no jurisdiction over, and therefore no data pertaining to, broadcasters outside the U.S.	
Call sign	KRON
Channel	4
Affiliation	NBC
City	San Francisco
Market Number	3
Excluded from	Entire Study
KRON's 1968 renewal was designated for hearing on 3/19/69; a final decision was not made until 5/3/73. During this period, the station was "in docket" and not required to submit renewal application information. Thus, we had no more recent data than that reflecting the station's performance between 1965 and 1968.	
Call sign	WCVB
Channel	5
Affiliation	ABC
City	Boston
Market number	6
Excluded from	Entire Study
WCVB is just barely into its second year of operation after a Commission and court battle that lasted nearly a decade; its licensee was a successful competing applicant for the frequency formerly licensed to WHDH, Inc.	
Call sign	WGHP
Channel	8
Affiliation	ABC
City	Greensboro
Market number	48
Excluded from	Composite ranking and public service announcements only
WGHP was renewed in 1966, but its 1969 renewal application was designated for hearing on 6/1/70. As yet unresolved, the most recent renewal application data reflects the station's performance between 1963 and 1966.	
Call sign	WKEF
Channel	22
Affiliation	ABC
City	Dayton
Market number	39
Excluded from	Composite ranking and public service announcements only
WKEF is a new UHF station which only commenced operation in 1969.	
Call sign	WTAR
Channel	3
Affiliation	CBS
City	Norfolk
Market number	44
Excluded from	Composite ranking and public service announcements only
WTAR was renewed in 1966, but its 1969 renewal application was designated for hearing on 1/21/70. As yet unresolved, the most recent renewal application data reflects the station's performance between 1963 and 1966.	

As an additional footnote, we wish to underscore the competitive problems faced by the five UHF affiliates that have been included in our study (WLKY, Louisville, 91st in our composite programming ranking; WDHO, Toledo, 100th; WHNB, Hartford, 103rd; WBMG, Birmingham, 139th; and WCCB, Charlotte, 144th). UHF stations are traditionally at a severe disadvantage in competing for viewers in a market, even when they are affiliated with a network. Virtually all UHF stations operate deeply in the red for years after they go on the air, and it can be expected that their performance will radically improve as they edge toward profitability. Finally, it must be noted that at least one of the UHF stations in this study, WDHO, Toledo, has been ranked on the basis of data submitted to the FCC before it had acquired even the financial stimulus of a network affiliation.

The analysis of the performance of those stations has been limited to information supplied by the broadcasters themselves on official U.S. Government forms in public files at the FCC.¹³ No monitoring (viewing or listening) of any of the stations was undertaken. Nor was there even an examination of TV Guide or local newspaper listings for additional information. There was neither the time nor the man-

¹³ In order to provide the broadest possible view of television in the top 50 markets, it was occasionally necessary to use station data reported by former licensees. For example, if a station received its license renewal in June, 1972, and was sold in August, 1972, our data was taken from the information of the earlier licensee. This was the case with the seven stations listed below:

KBTU, Channel 9, ABC, Denver, Colorado.
Present licensee: Combined Communications Corp.
Former licensee: Mullins Broadcasting Co.
Date of change: September 19, 1972
KGTU, Channel 10, NBC, San Diego, California
Present licensee: McGraw-Hill Broadcasting Co.
Former licensee: Time-Life Broadcasting, Inc.
Date of change: June 1, 1972
Former call letters: KOGO
KMGH, Channel 7, CBS, Denver, Colorado
Present licensee: McGraw-Hill.
Former licensee: Time-Life.
Date of change: June 1, 1972
Former call letters: KLZ
KOCO, Channel 5, ABC, Oklahoma City
Present licensee: Combined Communications
Former licensee: Cimaron Television Corp.
Date of change: August 29, 1972
WCHS, Channel 8, CBS, Charleston-Huntington, W. Va.
Present licensee: Rollins Telecasting, Inc.
Former licensee: WCHS AM-TV Corp.
Date of change: April 30, 1973
WRTV, Channel 6, WBC, Indianapolis
Present licensee: McGraw-Hill
Former licensee: Time-Life
Date of change: June 1, 1972
Former call letters: WFMB
WTMJ, Channel 4, NBC, Milwaukee
Present licensee: WTMJ, Inc.
Former licensee: The Journal Co.

In addition, data other than form 303 programming data from the seven stations listed below was partially affected by similar changes in licensees:

Financial and Employment Data:
WXII, Channel 12, NBC, Greensboro/Winston Salem/High Point, N.C.
Present licensee: Multimedia, Inc.
Former licensee: Triangle Broadcasting Corp.
Date of change: October 2, 1972
WBTU, Channel 3, CBS, Charlotte, N. Carolina
Present licensee: Jefferson-Pilot Broadcasting Co.
Former licensee: Jefferson-Standard Broadcasting Co.
Date of change: November 7, 1972
WDSU, Channel 6, NBC, New Orleans
Present licensee: Cosmos Broadcasting of Louisiana
Former licensee: WDSU-TV, Inc.
Date of change: November 29, 1972

Financial data only (taken partially from former and partially from present licensee):

WPVI, Channel 6, ABC, Philadelphia
Present: Capital Cities
Former: Triangle Publications
Date of change: April 27, 1971
WSAZ, Channel 3, NBC, Charleston-Huntington, W. Va.
Present licensee: Lee Enterprises, Inc.
Former licensee: Capital Cities
Date of change: April 27, 1971
WTEN, Channel 10, CBS, Albany-Schenectady-Troy, N.Y.
Present licensee: Albany TV, Inc.
Former licensee: Capital Cities
Date of change: April 27, 1971
WTHI, Channel 8, ABC, Hartford/New Haven
Present licensee: Capital Cities
Former licensee: Triangle Publications
Date of change: April 27, 1971

Finally, station WWYS-TV, Syracuse, New York, was granted a modification on December 12, 1972 that changed the name of the licensee from WRG Baker Television Corp. to WYNS-TV. The actual owners of the station remained substantially the same. And station WOTV, Grand Rapids-Kalamazoo was granted a change of call letters on July 1, 1972, from WOOD, although the licensee also remains the same.

power, and there was an affirmative desire to avoid any data gathering or subjective analyses that would subject the findings to "tis-tain't" arguments with broadcasters.

The findings are grouped into three separate chapters dealing with programming performance, minority and female employment statistics, and ownership information. A fourth chapter is devoted to the use of this information by interested community groups or individuals. Appendices have been added that deal with the computer programming methodology, potential sources of information and assistance for those interested in pursuing the subject further, and additional information not included in the main body of the report.

The method of analyzing the stations' performance has been to select the most precise criteria available from the data collected and then simply rank the stations based on their performance. Thus, in programming, some four factors were isolated and explored. They were then combined for determination of a single overall ranking based on a composite computation of programming performance.

By this method, television station KPIX, San Francisco, owned by the Westinghouse Broadcasting Company, was the best-programmed station among network affiliates in the top 50 markets as of June, 1973; WCCB, Charlotte, N.C., was the worst. There is often a wide range of performance among affiliates within a city. But Pittsburgh and Portland would appear to be among the best, and Charleston-Huntington, W. Va., and Kansas City, Mo., among the worst. Baltimore seems to have the best performance overall in local programming, Washington in news, public affairs and other; Syracuse scores lowest in both categories. Oklahoma City stations have the most public service announcements; Nashville stations the fewest. Westinghouse Broadcasting Company's five television stations ranked 1, 2, 4, 5 and 31, thus making Westinghouse by far the best multiple owner in the country. The stations of Taft, ranked 49, 120, 123, 134 and 136, showed that corporate owner to be one of the worst.

In the employment chapter, stations with low or non-existent minority or female employment are singled out for special mention, and all the stations in the study are ranked on the basis of total employment as well as employment of minorities and women in high-paying positions. Stations WTEV, Providence, WNYS, Syracuse, and WCAU, Philadelphia were among the best, while KSL, Salt Lake City, KMSP, Minneapolis and WKZO, Kalamazoo-Grand Rapids were among the worst.

In the ownership chapter, the findings have been collated and rearranged to show the performance of individual owners, especially when (as is most often the case) they own two or more stations. In each section Commission policy is considered and its shortcomings pointed out, but the most important part of this report is the information regarding the relative performance of each network affiliate in the top 50 markets. See Appendix D for a summary of the ten best and ten worst stations in each area of programming and employment and Appendix E for a summary of what we consider to be the minimum tolerable levels of performance in each of those areas.

Finally, Chapter 4 is included on the assumption that anyone interested in improving the quality of broadcasting in this country can

use this study as a handbook for the further pursuit of those improvements. This report is necessarily incomplete. Only the action of concerned people in their own local communities can ensure that it will have maximum impact on improving broadcasters' performance.

Chapter 1

PROGRAMMING PERFORMANCE

I. INTRODUCTION

The composite programming ranking announced in the Introduction to this report consists of an evaluation of the programming of each of 144 network affiliates in the top 50 markets on the basis of four distinct programming criteria: a combination of news, public affairs and other programming; local programming; commercialization; and allocation of financial resources to program expenditures. Each of these areas will be explained in detail, and individual area rankings given, in the four sections of this chapter below. The composite programming ranking that precedes the substantive discussion in this chapter was determined by transposing the quantitative performance of each licensee in each of the four areas onto a scale of 0 to 100, then weighting them equally in determining the final average on which the overall ranking was based. For a more complete explanation of the analytical models used in this section, see Appendix A. The programming criteria are presented in Table 2 in the form of the station's rank in each of the four areas. For a composite ranking that presents the criteria based on the relative scale of 0 to 100, see Table 1-a in Appendix C.

Network affiliates ranked by composite of all programming criteria

Rank	Call letters	Net. aff.	Mkt. No.	Location	Local	News, Pa. and other	Commer.	Financial
1	KPIX	CBS	8	San Francisco.....	31	13	1	103
2	WJZ	ABC	19	Baltimore.....	6	59	4	24
3	KING	NBC	16	Seattle-Tacoma.....	76	48	6	3
4	KDKA	CBS	9	Pittsburgh.....	4	6	30	57
5	KYW	NBC	4	Philadelphia.....	2	7	23	123
6	WPLG	ABC	18	Miami.....	10	1	81	52
7	WMAL	ABC	10	Washington, D.C.....	28	40	41	9
8	WTAE	ABC	9	Pittsburgh.....	52	60	10	15
9	WFMV	CBS	48	Gnsh-High Pt-Win Sal....	96	38	2	76
10	KGW	NBC	26	Portland.....	67	35	49	2
11	WWL	CBS	31	New Orleans.....	7	24	70	31
12	WRC	NBC	10	Washington, D.C.....	40	15	101	7
13	WABC	ABC	2	New York City.....	63	77	49	1
14	KNBC	NBC	9	Pittsburgh.....	3	3	138	35
15	WTIC	NBC	22	Hartford-New Haven....	17	53	101	8
16	WTIC	CBS	6	Boston.....	68	28	5	110
17	WNAC	ABC	26	Portland.....	37	41	24	59
18	KATO	ABC	36	Louisville.....	50	96	24	13
19	WHAS	CBS	27	Sacramento-Stockton....	35	84	23	20
20	KCRA	NBC	28	Portland.....	27	14	70	69
21	KOIN	CBS	28	Columbus.....	84	29	57	12
22	WBNS	CBS	45	Phoenix.....	22	19	81	61
23	KTAR	NBC	16	Seattle-Tacoma.....	8	64	63	48
24	KOMO	ABC	20	Cincinnati.....	32	66	57	28
25	WLWT	NBC	1	New York City.....	1	118	129	44
26	WCBT	CBS	12	St. Louis.....	75	4	108	27
27	KMOX	CBS	30	Nashville.....	59	11	101	36
28	WSM	NBC	41	Oklahoma City.....	24	97	63	16
29	WKY	NBC	37	Albany-Schenectady-T....	16	78	36	70
30	WAST	ABC			135	119	8	4

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Network affiliates ranked by composite of all programming criteria—Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	Local	News, Pa. and other	Commer.	Financial
31	WSB	NBC	17	Atlanta.....	5	56	49	116
31	WBZ	NBC	6	Boston.....	15	16	49	131
33	KSL	CBS	50	Salt Lake City.....	57	90	88	101
31	WMAR	CBS	19	Baltimore.....	11	25	78	101
35	WZZM	ABC	41	Kalamazoo-Gr Rapids.....	112	45	41	14
36	WDSU	NBC	31	New Orleans.....	20	55	81	55
37	WRTV	NBC	14	Indianapolis.....	65	39	36	64
38	WHEN	CBS	25	Buffalo.....	55	21	57	80
39	WNBC	NBC	1	New York City.....	60	17	88	58
40	KNXT	CBS	2	Los Angeles.....	21	8	121	88
41	KPRC	NBC	15	Houston.....	29	22	78	94
42	WCFO	CBS	20	Cincinnati.....	40	49	98	33
43	WMAQ	NBC	3	Chicago.....	41	2	132	74
44	KOVR	ABC	27	Sacramento-Stockton.....	134	120	16	5
45	WITI	ABC	21	Milwaukee.....	72	111	16	41
46	WCAU	CBS	4	Philadelphia.....	42	9	121	73
47	WSYR	NBC	43	Syracuse.....	117	127	13	10
48	WDAL	NBC	19	Baltimore.....	19	33	88	101
49	WBRC	ABC	38	Birmingham.....	23	12	49	144
50	WPVI	ABC	4	Philadelphia.....	14	62	112	45
51	WPRI	CBS	34	Providence.....	115	94	3	113
52	WAPI	NBC	38	Birmingham.....	126	46	16	63
53	KUTV	NBC	50	Salt Lake City.....	83	104	63	11
54	KWTV	CBS	41	Oklahoma City.....	77	82	70	25
55	WTOP	CBS	10	Washington D.C.....	79	10	117	50
56	WCKT	NBC	18	Miami.....	71	27	41	117
57	WSOC	NBC	35	Charlotte.....	122	75	16	47
58	WOAI	NBC	45	San Antonio.....	58	88	30	93
59	KSTP	NBC	13	Minneapolis-St Paul.....	43	91	57	71
60	WAGA	CBS	17	Atlanta.....	70	5	121	79
61	WSIX	ABC	30	Nashville.....	82	125	30	22
62	WOTV	NBC	41	Kalamazoo-Gr Rapids.....	48	37	106	67
63	WXII	NBC	48	Gnsb-High Pt-Win Sal.....	118	105	28	21
64	KIRK	ABC	15	Houston.....	18	95	63	100
65	WLWI	ABC	14	Indianapolis.....	64	26	129	37
66	KSD	NBC	12	St. Louis.....	36	68	70	108
67	WTVJ	CBS	18	Miami.....	105	87	33	46
68	KTVI	ABC	12	St. Louis.....	86	140	24	19
69	WWJ	NBC	5	Detroit.....	9	31	129	112
70	KHOU	CBS	15	Houston.....	25	30	108	127
71	WLGY	ABC	24	Tampa-St. Petersburg.....	61	44	81	96
72	WFBC	NBC	40	Gville-Sptnbg-Ashvl.....	104	63	13	249
73	WKBW	ABC	25	Buffalo.....	78	106	16	199
74	WTMJ	NBC	21	Milwaukee.....	13	92	106	89
74	WBBM	CBS	3	Chicago.....	33	15	141	65
76	KGO	ABC	8	San Francisco.....	94	70	98	30
77	WJW	CBS	7	Cleveland.....	69	43	101	77
78	KSAT	ABC	45	San Antonio.....	90	131	28	38
79	WVUE	ABC	31	New Orleans.....	107	112	41	34
80	WTVT	CBS	24	Tampa-St. Petersburg.....	80	32	117	51
81	WAVY	NBC	44	Nor-Newp News-Hamp.....	121	54	36	84
82	WBTW	CBS	35	Charlotte.....	46	52	88	120
83	WLWD	NBC	39	Dayton.....	30	42	137	83
84	WCCO	CBS	13	Minneapolis-St. Paul.....	12	74	139	72
85	WFAA	ABC	11	Dallas-Fort Worth.....	47	114	70	65
86	WLAC	CBS	30	Nashville.....	39	101	114	49
87	KCMO	CBS	23	Kansas City.....	54	69	101	97
88	WTFV	ABC	34	Providence.....	130	110	41	32
89	WMC	NBC	29	Memphis.....	38	80	114	92
90	WTEN	CBS	37	Albany-Schenectady-T.....	110	103	70	39
91	KOCO	ABC	41	Oklahoma City.....	62	124	81	53
92	WLKY	ABC	36	Louisville.....	136	142	11	23
93	WBAP	NBC	11	Dallas-Fort Worth.....	132	50	36	115
94	WJAR	NBC	34	Providence.....	114	47	70	91
95	WTNH	ABC	22	Hartford-New Haven.....	81	81	57	124
96	KFMB	CBS	49	San Diego.....	51	20	132	128
97	KTVK	ABC	45	Phoenix.....	88	122	49	75
98	WTOL	CBS	45	Toledo.....	87	71	63	122
99	KMGH	CBS	32	Denver.....	44	73	117	98
100	WDHO	ABC	45	Toledo.....	139	144	6	29
101	KDFW	CBS	11	Dallas-Fort Worth.....	26	34	121	141
102	KABC	ABC	2	Los Angeles.....	123	115	88	17
103	WHNB	NBC	22	Hartford-New Haven.....	116	23	63	136
104	WISH	CBS	14	Indianapolis.....	73	65	78	135
105	KXTV	CBS	27	Sacramento-Stockton.....	101	36	121	66
106	WAVE	NBC	36	Louisville.....	95	85	88	86
107	WNYS	ABC	43	Syracuse.....	144	143	8	18

Network affiliates ranked by composite of all programming criteria—Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	Local	News, Pa. and other	Commer.	Financial
108	WHEN	CBS	45	Syracuse.....	127	89	88	54
109	KCPX	ABC	50	Salt Lake City.....	142	136	16	40
110	WHTN	ABC	33	Charleston-Huntingto.....	140	107	16	102
111	WLOS	ABC	40	Onville-Sptnbg-Ashvl.....	143	137	12	60
112	KGTU	NBC	49	San Diego.....	111	102	88	62
113	KOA	NBC	32	Denver.....	56	79	108	132
114	KIRO	CBS	16	Seattle-Tacoma.....	66	83	108	125
115	WLS	ABC	3	Chicago.....	53	61	142	68
116	WKYC	NBC	7	Cleveland.....	113	86	121	43
117	WXYZ	ABC	5	Detroit.....	89	116	132	26
118	WRGB	NBC	37	Albany-Schenectady-T.....	100	121	36	129
119	WSPD	NBC	45	Toledo.....	124	113	41	107
120	WKRC	ABC	20	Cincinnati.....	74	138	33	133
121	WCHS	CBS	33	Charleston-Huntingto.....	85	132	24	140
122	KMSP	ABC	13	Minneapolis-St. Paul.....	109	141	13	126
123	WGR	NBC	25	Buffalo.....	141	109	41	81
124	WSAZ	NBC	33	Charleston-Huntingto.....	119	58	70	139
125	WEWS	ABC	7	Cleveland.....	92	134	98	56
126	WHIO	CBS	39	Dayton.....	45	123	132	87
127	WFLA	NBC	24	Tampa-St. Petersburg.....	120	51	132	78
128	WREC	CBS	29	Memphis.....	131	108	57	114
129	WSPA	CBS	40	Onville-Sptnbg-Ashvl.....	103	57	117	121
130	KENS	CBS	45	San Antonio.....	106	93	81	134
131	WLWC	NBC	28	Columbus.....	99	67	121	118
132	WISN	CBS	21	Milwaukee.....	97	98	121	82
133	WJBK	CBS	5	Detroit.....	93	99	114	106
134	WDAF	NBC	23	Kansas City.....	34	72	144	131
135	KMBC	ABC	23	Kansas City.....	102	133	88	90
136	WTVN	ABC	28	Columbus.....	128	130	63	105
137	WVEC	ABC	44	Nor-Newsp News-Hamp.....	137	135	41	95
138	WKZO	CBS	41	Kalamazoo-Gir Rapids.....	108	100	88	142
139	WBMG	CBS	38	Birmingham.....	125	117	49	143
140	KOOL	CBS	45	Phoenix.....	98	76	140	119
141	WHBQ	ABC	21	Memphis.....	138	139	49	111
142	KBTU	ABC	32	Denver.....	91	128	142	42
143	WQXI	ABC	17	Atlanta.....	129	126	112	99
144	WCCB	ABC	35	Charlotte.....	133	129	81	137

II. NEWS AND PUBLIC AFFAIRS

"60 per cent of all Americans over the age of 21 rely on television as their primary source of news." Barry Cole, *Television* (1970).

To argue that Congress intended television to be dedicated summarily to the aggrandizement of the personal or corporate fortunes of its licensees is to argue the absurd. Rather, Congress intended that television frequencies be used to serve the public,¹ and any reasonable interpretation of "serving the public" must include equipping them to be better citizens, via the informational programming most often encountered in the rather cumbersome categories known to the Commission as "news," "public affairs" and "other."²

¹ See 47 U.S.C. § 307(a)(b). Indeed, the Commission stated early in its development that:

It is axiomatic that one of the most vital questions of mass communications in a democracy is the development of an informed public opinion through the public dissemination of news and ideas concerning the vital issues of the day. It is this right of the public to be informed, rather than any other right on the part of the government, any broadcast licensee or any individual member of the public to broadcast his own particular views of any matter, which is the foundation stone of the American system of broadcasting.

Quoted in Walter Emery, *National and International Systems of Broadcasting*, at 13, Michigan State University Press (1969). For legislative history of the Communications Act, see Rosenbloom, "Authority of the Federal Communications Commission," in Coons, ed., *Freedom and Responsibility in Broadcasting* at 96 (1961).

² The categories of "news" and "public affairs" are self-explanatory. "Other" programming is described as all programming not falling in those two categories or in the categories of "entertainment" or "sports."

The Commission first determined that news and public affairs were "critical programming categories" and began collecting this data in its current form in 1966, when it adopted the license renewal application now in use.³ But collecting this data and putting it to significant use are two entirely different things, and the practice of this Commission to date has been to make no inquiry whatsoever into a licensee's news, public affairs, and other non-sports, non-entertainment programming, no matter how badly a station had performed, and more than a few stations have been renewed notwithstanding a total failure to deliver programming in one or more of these categories.⁴ Even a major television station like WCCO-TV, a Minneapolis CBS affiliate, was renewed automatically in March, 1968, despite *no* public affairs shown during the composite week and only 30 minutes weekly proposed for the future.

Although the Commission has never set standards in its renewal procedures for weighing the news and public affairs data it receives, a 5% news, 1% public affairs and 5% "other" standard thought to be comparable to the minimum diet necessary to stave off complete informational starvation was established and discussed at one time by just two of the seven Commissioners (Cox and Johnson).⁵ Since those standards have been so minimal and so easy to comply with, many previously offending broadcasters have made an effort to do so, as can be seen by a glance at the raw data in the three categories.⁶ There continues to be some, however, who do not choose even to provide that infinitesimal level of public service, who regularly devote more minutes of time to commercials than to the three informational categories combined; and yet the staff continues to do nothing every two months but provide, as a gesture of courtesy, a compilation of those stations falling below the 5-1-5 standard in each bi-monthly "package" of renewals for the remaining concerned Commissioner to use in his lonely dissents.

The news, public affairs, and other programming information required of a licensee on his renewal application is collected in the form of hours and minutes of air time devoted to each. Of course, quality of programming cannot be determined from this data. It is impossible to tell without actual observation, for example, whether a station's news operation is of the wire service "rip and read" variety or whether there are mobile camera units roaming the city to provide original feeds at all hours. Until such information is available, however, we must rely on what the stations are required to tell the Commission quantitatively about their programming operations. For, although a station broadcasting only 8 hours of news in a 140-hour week may in fact be investing more time, expense, and imagination in its production than one airing 14 hours in the same week, the only presumption we can make is the contrary—the more news, the better the potential for service to the public. We proceed therefore on the assumption that, all other factors being equal, a station running 14 hours of news on a weekly basis better serves the public interest and need than a

³ FCC 2d 175 (1966).

⁴ See, e.g., *Herman C. Hall*, 11 FCC 2d 344 (1968).

⁵ See discussion of these studies at notes 5, 6 and 7 in the Introduction to this Report.

⁶ The ten best and ten worst stations in each category may be found in Appendix D.

station running 8 hours. The same reasoning would apply to public affairs and other programming.

Another shortcoming of the existing renewal application is that it makes no inquiry into *when* during the broadcast day news, public affairs, and other programming are being aired. It is conceivable, for example, that a station may air one hour of public affairs between 3:30 am and 4:30 am daily and, when this is added to its other public affairs programs, post a total of 10 hours for the week.⁷ It should be self-evident, however, that the seven hours of programming in the early morning can be written off as little more than no programming at all, reaching such a small audience as to be of virtually no service to the public. This lacuna in our information must be borne in mind when reviewing these figures, and local program guides or station logs should be consulted to learn the distribution of news, public affairs and other programming in a particular station's broadcast week.

Our ranking of station programming performance is based solely on the hours of programming presented. For the overall ranking of this performance factor, we have simply added together the number of hours and minutes of news, public affairs and other programming presented during the composite week and ranked the stations on the basis of that total. We list the number of hours of each of the three categories separately, and provide a ranking for each. For example, the top station in the overall news-public affairs-"other" ranking, station WPLG, Miami, can be seen to be number 9 in news, number 7 in public affairs and number 12 in other programming. These additional statistics are provided in this chapter because a station's failure to devote substantial time to any one of them is indefensible *whatever* its overall ranking, and such a station should be singled out for further inquiry.⁸

Although the *percentage* of the total programming week devoted by a licensee to each of these categories is available from the station's license renewal form and has been used in similar studies in the past,⁹ we have decided in this study to use the raw total of hours. This has been done because the use of percentages, we feel, tends to favor those broadcasters with a shorter broadcast week. For example, a station on the air 120 hours a week with 12 hours of news would be programming 10% news, while a station broadcasting 146 hours a week with 13 hours of news would actually show a *lower* percentage. We feel the additional hours of news programmed by the latter should be given greater credit than the higher percentage of the former, and have acted accordingly.

In addition to the hours of news, public affairs, and other programming broadcast by a station in the composite week, the disparity between a station's promised performance and its actual performance and the decrease (or increase) in performance levels from one renewal period to the next can also be revealing measures of a station's service. Indeed, the Commission has said as much in a few specific

⁷ In addition, many commercial stations will run the same public affairs special more than once, thereby getting credit for two or even three hours of programming for just one show.

⁸ WLWI, Indianapolis, for example, was number 26 in its overall news, public affairs and other ranking, due to a fine showing in the latter two categories (32nd and 4th). Its news programming, however, placed it an abysmal 127th, thereby clearly delineating an area in which the licensee could improve.

⁹ See the studies cited in notes 5, 6, and 7 in the Introduction to this Report.

Network affiliates ranked by total hours of news, Public Affairs, and "Other" in composite week

Rank	Call letters	Net. aff.	Mkt. No.	Location	News and rank	Pub. affairs and rank	Other and rank	Composite
1	WFLG	ABC	18	Miami	17.90	11.12	7	45.833
2	WMAQ	NBC	9	Chicago	16.88	9.10	15	43.083
3	KNBC	NBC	4	Los Angeles	22.60	10.03	9	42.817
4	WGBS	CBS	27	New York City	16.13	4.10	83	41.950
5	WAGA	CBS	12	Atlanta	17.72	4.97	59	41.590
6	WDKA	NBC	2	Pittsburgh	20.30	7.13	31	40.879
7	KYW	NBC	6	Philadelphia	18.55	11.43	3	40.817
8	KXAT	CBS	19	Los Angeles	17.05	4.10	83	40.783
9	WCAU	CBS	25	Philadelphia	16.37	3.62	98	40.100
10	WTOF	CBS	17	St. Louis	17.12	9.52	68	39.550
11	KMOX	CBS	26	St. Louis	16.25	4.78	88	39.167
12	WTOF	CBS	23	St. Louis	13.97	6.07	39	38.750
13	KPIX	ABC	3	Birmingham	16.42	10.72	8	38.700
14	KCR	NBC	3	San Francisco	14.53	7.67	77	38.383
15	WBZ	NBC	41	Sacramento-Stockton	14.53	9.37	23	37.953
16	WBZ	NBC	7	Washington D.C.	15.08	7.78	19	37.883
17	WBNC	NBC	30	Boston	15.08	11.13	6	37.883
18	WBNC	NBC	49	New York City	14.28	5.57	47	37.883
19	WBNS	CBS	55	Chicago	13.60	6.00	47	37.883
20	KFMB	CBS	5	San Diego	19.27	4.22	90	37.267
21	WBEN	CBS	30	Buffalo	15.90	7.82	27	36.667
22	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
23	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
24	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
25	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
26	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
27	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
28	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
29	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
30	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
31	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
32	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
33	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
34	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
35	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
36	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
37	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
38	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
39	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
40	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
41	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
42	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
43	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
44	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
45	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
46	WBEN	CBS	32	Houston	13.80	7.82	27	36.667
47	WBEN	CBS	32	Houston	13.80	7.82	27	36.667

Network affiliates ranked by total hours of news, Public Affairs, and "Other" in composite week—Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	News and rank	Pub. affairs and rank	Other and rank	Composite
46	KING	NBC	16	Seattle-Tacoma	13.48	4.50	72	31.233
47	WFO	NBC	20	Cincinnati	15.27	7.22	110	31.007
48	WBAP	NBC	11	Dallas-Fort Worth	15.62	7.22	110	31.007
49	WFLA	NBC	24	Tampa-St. Petersburg	15.10	2.98	110	30.933
50	WFTV	NBC	35	Charlotte	15.13	3.30	106	30.833
51	WUCB	NBC	9	Pittsburgh	17.55	4.83	62	30.783
52	WVTV	NBC	44	Norfolk-Newsp-Hamp.	13.50	8.15	17	30.750
53	WDSU	NBC	31	Atlanta	17.12	4.53	71	30.750
54	WWSB	NBC	17	New Orleans	17.40	4.10	99	30.717
55	WSPA	NBC	47	Charleston-Huntington	11.32	5.38	100	30.500
56	WVAZ	NBC	33	Chattanooga	14.37	5.38	61	30.483
57	WVLA	NBC	19	Baltimore	11.82	11.90	2	30.333
58	WVLA	NBC	9	Pittsburgh	11.82	11.90	2	30.333
59	WVLA	NBC	3	Chicago	9.80	7.22	12	30.200
60	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
61	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
62	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
63	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
64	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
65	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
66	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
67	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
68	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
69	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
70	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
71	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
72	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
73	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
74	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
75	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
76	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
77	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
78	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
79	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
80	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
81	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
82	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
83	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
84	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
85	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
86	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
87	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
88	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
89	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
90	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
91	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
92	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
93	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183
94	WVLA	NBC	4	Philadelphia	9.80	7.22	12	30.183

Arkansas, Louisiana and Mississippi 1973 Renewals

21

95	KTRK	ABC	15	Houston	10.37	91	4.85	61	9.82	89	25.033
96	KATU	ABC	26	Portland	10.85	94	2.83	120	11.83	53	25.517
97	WSM	NBC	64	Nashville	13.00	64	8.15	77	8.17	113	25.517
98	WSN	NBC	104	Nashville	10.23	104	2.80	121	12.85	42	25.332
99	WKZQ	CBS	107	Detroit	10.05	107	3.28	110	12.85	50	25.330
100	WKZQ	CBS	124	Detroit	8.58	124	3.30	136	11.45	28	25.333
101	KATV	NBC	39	Kalamazoo-Gt Rapids	10.83	39	2.80	137	11.83	53	25.000
102	KATV	NBC	97	Nashville	13.37	97	2.80	137	6.77	131	21.833
103	KATV	NBC	102	San Diego	10.12	102	3.20	114	10.65	74	24.467
104	WTEN	CBS	41	Albany-Schenectady-T	10.32	41	5.08	114	8.12	114	24.417
105	KXII	NBC	93	Salt Lake City	10.32	93	4.45	74	8.93	102	24.267
106	WKBW	NBC	123	Gnsb-High Pt-Win Ed.	8.75	123	5.82	43	9.67	93	24.233
107	WHTN	ABC	105	Buffalo	10.22	105	3.48	103	10.50	80	24.200
108	WREC	CBS	89	Memphis	11.05	89	4.17	82	8.75	104	23.850
109	WGR	NBC	100	Charleston-Huntington	11.05	100	4.03	70	8.45	97	23.850
110	WTEV	ABC	78	Buffalo	11.60	78	5.05	45	8.45	137	23.500
111	WTEV	ABC	95	Pittsburgh	9.55	95	3.13	104	10.31	84	23.363
112	WTEV	ABC	111	Pittsburgh	10.06	111	3.42	104	10.31	84	23.363
113	WFAA	NBC	106	New Orleans	9.06	106	3.20	126	11.10	87	23.300
114	WFAA	NBC	111	New Orleans	12.02	111	3.20	112	7.17	131	23.033
115	WFAA	NBC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
116	WYZZ	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
117	WBMG	CBS	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
118	WMT	NBC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
119	WAST	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
120	KOVR	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
121	WGRB	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
122	KTVK	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
123	WHIO	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
124	WUAB	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
125	WSIX	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
126	WSIX	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
127	WSYR	NBC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
128	WTVN	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
129	WTVN	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
130	KSAT	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
131	KSAT	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
132	WCHS	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
133	WCHS	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
134	WCHS	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
135	WCHS	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
136	WCHS	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
137	WCHS	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
138	WCHS	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
139	WCHS	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
140	WCHS	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
141	WCHS	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
142	WCHS	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
143	WCHS	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033
144	WCHS	ABC	111	Dallas-Fort Worth	12.02	111	3.20	112	7.17	131	23.033

instances in the past.¹⁰ And even the current Commission, which at one time or another has indicated that it favors the total elimination of *existing* Commission programming standards, concedes that a station's "promise vs. performance" is a valid indication of its performance in the public interest.¹¹ While we have not attempted, due to the length of this study, to relate the licensees' most recent performance to either his current or his previous promises, the necessary information is readily available, in the licensee's public file or at the FCC for those who are interested.

Public Service Announcements

In addition to requiring information with respect to news, public affairs, and other programming, the FCC requires that stations report the number of public service announcements (psa's) aired during the composite week and the number proposed to be aired during an average week in the future renewal period. While the broadcasting of psa's is one measure of a station's performance in the public interest, the Commission, in common with the data it receives on news, public affairs, and other programming, has never attempted to set "psa standards" at renewal time, for the purpose of evaluating licensee performance.¹²

Although we believe that the quantity of psa's broadcast by a station in any given week is a measure of its performance in the public interest, it must be recognized that the number by itself reveals very little about a station's performance. In point of fact, what the figure does not reveal may be even more significant than what it does.

The figure does *not* disclose, for example, how the psa's are distributed during a typical broadcast day. Because they are aired free of charge it is likely that a station will run them most frequently during the hours when its rates are lowest and it sells the least commercial time—i.e., late night and early morning. The natural tendency, given that television as presently constituted is a profit-maximizing enterprise, is to broadcast psa's in the hours when air time is cheapest and, accordingly, audiences smallest. To run a sixty-second psa during prime time will ordinarily cost a station hundreds of dollars in lost revenue, whereas running it at 2:30 am entails either no loss (because the time could not be sold) or a loss of considerably smaller magnitude. Notwithstanding, therefore, that a station may be presenting large numbers of psa's during any given week, their effect and value will be marginal if they appear predominantly at those times when television audiences are smallest.

Not only does the present renewal application not disclose the distribution of psa's, but it also does not disclose their length. Although a psa of ten seconds duration may on occasion be just as effective as one of sixty seconds, it is likely that a station running five- and ten-second psa's exclusively is doing so solely in order to lose as little revenue as possible and is therefore indiscriminately rejecting all announcements

¹⁰ See, e.g., *WKBN Broadcasting Corp.*, 30 FCC 2d 958, 975 (1971); *Southern Broadcasting Co.*, 26 FCC 2d 998 (1970); *WMOZ, Inc.*, 36 FCC 201, 241 (1964); and *KORD, Inc.*, 31 FCC 85, 88 (1961).

¹¹ See Letter from Clay T. Whitehead, Director of Office of Telecommunications Policy, to Rep. Carl Albert, March 13, 1973.

¹² Indeed, Deputy Broadcast Bureau Chief Harold Kassens, in noting that some licensees even fail to fill in this blank on their application, said "It doesn't matter whether they run one or 1000 . . . we're not going to do anything about it. . . ."

of greater length. This practice is manifestly not consonant with station performance in the public interest.

Finally, the renewal application does not require that a licensee disclose the source of psa's. Licensees have a Congressional mandate to serve the public interest, convenience, and necessity of their local communities, and it necessarily follows that psa's should be well-suited to this task. Although national organizations are fully entitled to free time for psa's, service to the local community is the *raison d'être* of a television station, hence locally produced announcements ought to be given preferred treatment. When a station airs only professionally produced announcements from national organizations (e.g., Heart Association, the U.S. Army or CARE), because they are better-sounding or appearing or easier to broadcast for technical reasons, or because they are less hard-hitting and controversial (having been cleared by the Advertising Council), it can scarcely be maintained that the local community is being as well served as it would be by announcements regarding even a local blood drive or a library fund-raising event—not to mention more controversial local issues. Unfortunately, the present renewal application does not reveal whether or not such treatment is in fact being accorded locally originated psa's, and determination of that, as well as the time and duration of announcements, must be left to the monitoring techniques of concerned local organizations.

Notwithstanding these substantial shortcomings, the number of announcements listed on the renewal applications does give some indication of service to the public. We do feel that the station with 450 psa's and the station with but 50 both deserve to have that fact noted in our study. Accordingly, we present below a ranking based solely on the number of psa's. Because of the defects in these numbers which we have just discussed, however, we have not included this factor in our final composite ranking.

Network Affiliates Ranked by Number of Public Service Announcements in Composite Week

Rank	Call letters	Net. aff.	Mkt. No.	Location	PSA's
1	WKY	NBC	41	Oklahoma City.....	572
2	WJZ	ABC	19	Baltimore.....	495
3	KYW	NBC	4	Philadelphia.....	464
4	WLCY	ABC	24	Tampa-St. Petersburg.....	462
5	KOIN	CBS	26	Portland.....	446
6	WVTV	CBS	24	Tampa-St. Petersburg.....	386
7	WJAR	NBC	34	Providence.....	369
8	KWTV	CBS	41	Oklahoma City.....	365
9	KDKA	CBS	9	Pittsburgh.....	364
10	WPVI	ABC	4	Philadelphia.....	348
11	KOOL	CBS	45	Phoenix.....	336
12	KPRC	NBC	15	Houston.....	327
13	WTIC	CBS	22	Hartford-New Haven.....	326
14	KPIX	CBS	8	San Francisco.....	317
15	WBNS	CBS	28	Columbus.....	317
16	WTAE	ABC	9	Pittsburgh.....	309
17	WBZ	NBC	6	Boston.....	300
18	WMAL	ABC	10	Washington, D.C.....	300
19	WAPI	NBC	28	Birmingham.....	300
20	WAVY	NBC	44	Nor-Newp News-Hamp.....	297
21	WBAL	NBC	19	Baltimore.....	290
22	WCBS	CBS	1	New York City.....	287
23	WNAC	ABC	6	Boston.....	286
24	WZZM	ABC	41	Kalamazoo-Gr Rapids.....	285
25	KOMO	ABC	16	Seattle-Tacoma.....	281
26	WRGB	NBC	37	Albany-Schenectady-T.....	272
27	WSYR	NBC	43	Syracuse.....	270
28	WINH	ABC	22	Hartford-New Haven.....	270

Network Affiliates Ranked by Number of Public Service Announcements—Con.

Rank	Call letters	Net.	Mkt. No.	Location	PSA's
29	KCPX	ABC	50	Salt Lake City.....	269
30	WBAP	NBC	11	Dallas-Fort Worth.....	265
31	WKBB	ABC	25	Buffalo.....	263
32	KGW	NBC	26	Portland.....	262
33	WTEV	ABC	34	Providence.....	259
33	KOCO	ABC	41	Oklahoma City.....	259
35	WBEN	NBC	23	Buffalo.....	258
36	WLWT	NBC	20	Cincinnati.....	256
37	KFMB	CBS	49	San Diego.....	251
38	WCAU	CBS	4	Philadelphia.....	247
38	WOAI	NBC	45	San Antonio.....	247
40	WTOP	CBS	10	Washington, D.C.....	246
41	WMAR	CBS	19	Baltimore.....	245
41	WKRC	ABC	20	Cincinnati.....	243
43	KABC	ABC	2	Los Angeles.....	242
44	WQXI	ABC	17	Atlanta.....	241
45	KDFW	CBS	1	Dallas-Fort Worth.....	241
45	KSD	NBC	12	St. Louis.....	241
45	WCKT	NBC	18	Miami.....	241
48	WAST	ABC	37	Albany-Schenectady-T.....	238
49	KMOX	CBS	12	St. Louis.....	237
50	WLWI	ABC	14	Indianapolis.....	235
51	KMGH	CBS	32	Denver.....	234
52	WTEN	CBS	37	Albany-Schenectady-T.....	231
52	WBBM	CBS	3	Chicago.....	230
54	WFLA	NBC	24	Tampa-St. Petersburg.....	230
54	KATU	ABC	26	Portland.....	226
56	WPLG	ABC	18	Miami.....	226
56	WLIC	NBC	9	Pittsburgh.....	224
58	WISN	CBS	21	Milwaukee.....	221
59	WHTN	ABC	33	Charleston-Huntington.....	218
60	KHOU	CBS	15	Houston.....	216
61	KOA	NBC	32	Denver.....	214
62	WABC	ABC	1	New York City.....	212
63	WBTW	CBS	35	Charlotte.....	211
64	KENS	CBS	45	San Antonio.....	207
65	WNBC	NBC	1	New York City.....	207
65	WHAS	CBS	36	Louisville.....	204
67	WFAA	ABC	11	Dallas-Fort Worth.....	204
67	WISH	CBS	14	Indianapolis.....	203
69	WGB	NBC	25	Buffalo.....	200
69	WCHS	CBS	33	Charleston-Huntington.....	198
71	WJW	CBS	7	Cleveland.....	197
72	WVUE	ABC	31	New Orleans.....	195
73	WNYS	ABC	43	Syracuse.....	195
74	KXTV	CBS	27	Sacramento-Stockton.....	194
74	WOTV	NBC	41	Kalamazoo-Gr Rapids.....	192
76	WTVN	ABC	28	Columbus.....	191
77	KCRA	NBC	27	Sacramento-Stockton.....	188
78	WSB	NBC	17	Atlanta.....	186
79	WLWD	NBC	30	Dayton.....	185
80	WMC	NBC	29	Memphis.....	185
81	WDAF	NBC	23	Kansas City.....	184
81	WBRB	ABC	38	Birmingham.....	184
83	WWJ	NBC	5	Detroit.....	183
83	WAVE	NBC	36	Louisville.....	183
85	KNXT	CBS	2	Los Angeles.....	182
85	WFBC	NBC	40	Greenville-Spartanburg-Ashvi.....	179
87	WLS	ABC	3	Chicago.....	179
88	WKYC	NBC	7	Cleveland.....	179
88	WRTV	NBC	14	Indianapolis.....	177
89	KTAR	NBC	45	Phoenix.....	177
91	WLWC	NBC	28	Columbus.....	177
91	WSAZ	NBC	33	Charleston-Huntington.....	177
91	WVEC	ABC	44	North-Newp News-Hamp.....	177
91	WPMY	CBS	48	Greenville-Spartanburg-Ashvi.....	176
95	WWL	CBS	31	New Orleans.....	173
96	WRC	NBC	10	Washington, D.C.....	172
97	KMBC	ABC	23	Kansas City.....	172
97	KOVR	ABC	27	Sacramento-Stockton.....	169
99	KNBC	NBC	2	Los Angeles.....	166
100	WAGA	CBS	17	Atlanta.....	165
101	WMAQ	NBC	3	Chicago.....	165
101	KTRK	ABC	15	Houston.....	165
103	WTOL	CBS	45	Toledo.....	162
104	WSFA	CBS	40	Greenville-Spartanburg-Ashvi.....	159
105	WPR	CBS	31	Providence.....	155
106	KGO	ABC	8	San Francisco.....	155

Network Affiliates Ranked by Number of Public Service Announcements—Con.

Rank	Call letters	Net. aff.	Mkt. No.	Location	PSA's
106	KUTV	NBC	50	Salt Lake City.....	155
108	WSPD	NBC	45	Toledo.....	154
109	KCMO	CBS	23	Kansas City.....	151
109	WSOC	NBC	35	Charlotte.....	151
111	KTVK	ABC	45	Phoenix.....	150
112	WXII	NBC	48	Gnsp-High Pt-Win sal.....	149
112	WTWJ	CBS	18	Miami.....	149
112	WCCB	ABC	35	Charlotte.....	149
115	WHEN	CBS	43	Syracuse.....	148
116	WCCO	CBS	13	Minneapolis-St Paul.....	147
117	WDHO	ABC	45	Toledo.....	146
118	KSL	CBS	50	Salt Lake City.....	135
119	WBMG	CBS	38	Birmingham.....	134
120	WHI	ABC	21	Milwaukee.....	133
121	KGIV	NBC	49	San Diego.....	132
122	KMSF	ABC	13	Minneapolis-St. Paul.....	130
123	KBTW	ABC	32	Denver.....	129
124	WEWS	ABC	7	Cleveland.....	127
125	WLOS	ABC	40	Greenville-Spartanburg-Ashvi.....	126
126	KSIP	NBC	13	Minneapolis-St. Paul.....	124
127	WCPO	CBS	29	Cincinnati.....	121
128	KSAT	ABC	45	San Antonio.....	115
129	WKZO	CBS	41	Kalamazoo-Gr Rapids.....	114
130	WLKY	ABC	36	Louisville.....	112
131	WREC	CBS	29	Memphis.....	112
132	WJBK	CBS	5	Detroit.....	110
133	KING	NBC	16	Seattle-Tacoma.....	109
134	WHBQ	ABC	29	Memphis.....	107
135	WTMJ	NBC	21	Milwaukee.....	103
136	WDSU	NBC	31	New Orleans.....	98
137	KTVI	ABC	12	St. Louis.....	86
138	WSIX	ABC	30	Nashville.....	84
139	WLAG	CBS	30	Nashville.....	84
140	KIRO	CBS	16	Seattle-Tacoma.....	83
141	WXYZ	ABC	5	Detroit.....	81
142	WSM	NBC	30	Nashville.....	75
143	WHIO	CBS	39	Dayton.....	60
144	WHNB	NBC	22	Hartford-New Haven.....	0

III. COMMERCIALIZATION

Public concern with the amount and character of broadcast advertising was recognized as early as 1922 when Herbert Hoover, then Secretary of Commerce and in charge of radio regulation, said: "It is inconceivable that we should allow so great a possibility for service, for news, for entertainment, for education and for vital commercial purposes to be drowned in advertising chatter."¹³

In 1960 the FCC said that broadcast licensees have an obligation "to avoid abuses with respect to the total amount of time devoted to advertising continuity as well as the frequency with which regular programs are interrupted for advertising messages."¹⁴ The problem, however, is that the Commission has never done anything concrete about overcommercialization, because its knee-jerk response tends to be to protect the industry's profits rather than the public interest.

In 1963, for example, the Commission tentatively announced that it would attempt to propose the adoption of rules requiring all broadcast licensees to observe the limitations on advertising contained in the industry's own self-regulatory handbook, the National Association of Broadcasters Code of Good Practices.¹⁵ Those limitations, which can be

¹³ *Hearings Before Communications Subcommittee of Committee on Interstate and Foreign Commerce on H.R. 8316, H.R. 8318, H.R. 8729, H.R. 8896, H.R. 8980, H.R. 9042* at 37 (Nov. 6, 1963).

¹⁴ *Id.*
¹⁵ See the comprehensive discussion of this rulemaking and its ultimate demise in Krasnow and Longley, *The Politics of Broadcast Regulations* 105-111 (1973).

ignored by broadcasters if they choose, today would include 9½ minutes per hour of commercials in prime time and 16 minutes at all other times *except* children's weekend programming, from 7:00 am to 2:00 pm Saturday and Sunday, which has recently been limited to 12 minutes per hour.

Needless to say, the industry outcry to the suggestion was as rapid as it was furious, and the Commission quickly backed off with a 1964 promise to continue to develop its policy on commercialization on a case by case basis.¹⁶ *Broadcasting Magazine*, always privy to the Commission's innermost thoughts and processes, assured the industry in July of 1964 that only the most extreme cases of overcommercialization would ever be brought to the Commission's attention.¹⁷

The basic assumption used in applying the commercialization factor in the final ranking of our study is that the greater the emphasis on commercials (the more the commercial time) the worse the station is performing. While recognizing the current need of the broadcaster to protect his financial self-interest (and that of his stockholders), we have attempted to balance that self-interest against the needs of the viewing public in determining the relative service of each affiliate in the study. Moreover, we are not convinced that greater service to the public, via fewer commercials, necessarily means less revenue to the broadcaster. An advertising executive concerned about the value of his commercial product recently screened for his colleagues a single "clutter clip" spanning the even minute period between the end of one prime time network show and the beginning of the next, in which he counted no fewer than thirty-five separate "messages" to the viewer! Surely, if fewer "minutes" of commercial time are made available, as a service to the public, the advertiser will be willing to pay a higher price for the greater exclusivity he is buying.

This theory is at least partially borne out by the variety of international experiences in setting commercial limitations. In Germany, for example, advertisers willingly pay more for one of the twenty minutes of commercials allowed per *day* than they would if commercials were appearing at a rate of 12 or 16 minutes per hour. Such advertising, moreover, is strictly limited to the 6-8 pm portion of German "prime time," in which the normally varied German television fare is given over to—you guessed it!—American series reruns. Other international standards included those of France which, in 1968, only allowed a total of 2 minutes of advertising per day. Newer rulings, however, allow 5 minutes of advertising on one channel and 15 minutes on another. Canada limits commercial time to 7 minutes per hour segment and also places a limit on the amount of advertisements during any 15 minute period to 5 in number and 4 minutes of total time.

The extent of the Commission regulation of commercials at the present time is "the 18 month letter" which is sent to all television licensees who propose in their renewal applications to exceed 16 minutes of commercial matter per hour. In response to this letter the applicant must give information on complaints, total number of hours

¹⁶ *Id.*, at 107. The Commission found its ground cut out from under it by a concerted broadcaster assault on Congress which led to hearings on a bill "to prohibit the Commission from adopting any rules governing the length or frequency of broadcast ads." When the bill overwhelmingly passed the House (before dying in the Senate) the Commission seemed to get the "message" and allowed its rulemaking to expire without coming to any results.

¹⁷ "FCC Again Rebuff's Chairman," *Broadcasting*, July 27, 1969, at 34.

in excess of 16 minutes of commercial time, and defenses of the station's policies in terms of community and public interest. The "18 month letter" amounts only to a doubt expressed by the Commission that the licensee is not meeting the public interest in commercialization—a "doubt" involving as little actual sanction as does the NAB Code.

The data gathered in the course of this study was limited to the resources available, namely the license renewal form 303 filed by the licensee. Form 303, Section IV-B, Part IV asks the applicant to list past commercial practices and Part V asks for proposed commercial practices including the following questions: "What is the maximum amount of commercial matter in any 60 minute segment which the applicant proposes normally to allow? If the applicant proposes to permit this amount to be exceeded at times, state under what circumstances and how often this is expected to occur, and the limits that would then apply." The form fails, however, to request a breakdown of commercialization in prime time and non prime-time hours. Nor does it require submission of crucial information on program interruption or other matters, such as loudness violations.¹⁹

The license renewal application requests the licensee to submit the number of 60 minute segments which fall into four categories: (A) up to and including 8 minutes; (B) over 8 and up to and including 12 minutes; (C) over 12 and up to and including 16 minutes; (D) over 16 minutes. We concluded that the categories (C) and (D) (over 12-16, and over 16) were most significant for our study; 12 minutes of commercials per hour means that the public is being subjected to commercials at a rate of one hour out of every five, or 20% of all broadcasting time, and is a useful maximum limit. Such commercialization would violate even the industry's own standards in prime time and during children's programming. We find no justification for giving any weight at all to the NAB's 16 minute non-prime time standard.

The total column and the ranking column in the commercialization table will indicate the number of 60 minute segments in which 12 or more commercial minutes appeared during the composite week: the number one station is therefore that station with the *fewest* 60 minute segments with 12 or more commercial minutes.

We considered and rejected using a method of ranking based on the number of 60 minute segments with 12 or more minutes of commercials expressed as a percentage of the total number of 60 minute segments in the station's broadcast week, because a clear advantage would then accrue to stations operating between 12 midnight and 6:00 am, when far fewer commercials can be sold. The result would have been an unrealistic lower overall percentage. By using raw data the focus is on the time of greatest audience viewing, and a more accurate reflection of significant overcommercialization should thus be obtained.

We also considered more heavily weighting the over-16 category as a penalty, since *per se* violations were obvious here. A random sampling of the stations indicated, however, that this category produced

¹⁹ Statement of Policy Concerning Loud Commercials, FCC 63-618 (July 12, 1965).

such a small occurrence relative to those in the over 12 to 16 category (just one or two 60 minute segments per station) that unless an extremely high weighting factor (*e.g.*, 5x) was applied there would be no significance to the overall ranking. Moreover, any weighting would necessarily be arbitrary. Where ties occurred, however, in the commercialization ranking, the number of segments of over-16 minutes of commercials was used to break them.

We recognize that this analysis—and the data upon which it is based—is less than ideal. For a broadcaster to run 13 minutes of non-program matter during 60 minutes when the NAB Code would permit 16 is one thing; to run 13 minutes when the Code permits 9½ is something else again. And yet the renewal form does not permit such distinctions. On the other hand, to the viewer who *is* watching, 13 minutes is 13 minutes whatever time of day the commercials may be run.

Another factor we could not analyze from the available data was whether a broadcaster *could have* sold more commercials than he did. For example, of the 20 highest ranked stations on the commercialization index (that is, the 20 with the fewest number of commercials) 14 are in markets 26 to 50. It is possible to conclude that this "favorable" ranking reflects no higher ethical values, or desire to serve the public interest, but merely the inability to sell more commercials than that.

Network Affiliates Ranked by Number of Composite Week Hours With More Than 12 Min of Commercials

Rank	Call letters	Net. aff.	Mkt. No.	Location	12-16 min.	Over 16	Total
1	KPIX	CBS	8	San Francisco.....	2	0	2
2	WFMY	CBS	48	Gnsb-High Pt-Win Sal.....	4	0	4
3	WPRI	CBS	34	Providence.....	10	1	11
4	WJZ	ABC	19	Baltimore.....	13	0	13
5	WTIC	CBS	22	Hartford-New Haven.....	15	0	15
6	KING	NBC	16	Seattle-Tacoma.....	18	0	18
6	WDHO	ABC	45	Toledo.....	18	0	18
8	WNYS	ABC	43	Syracuse.....	19	0	19
9	WAST	ABC	37	Albany-Schenectady-T.....	18	1	19
10	WTAE	ABC	9	Pittsburgh.....	20	0	20
11	WLKY	ABC	36	Louisville.....	21	1	22
12	WLOS	ABC	40	Gnville-Sptnbg-Ashvl.....	23	0	23
13	WSYR	NBC	43	Syracuse.....	24	0	24
13	WFBC	NBC	40	Gnville-Sptnbg-Ashvl.....	24	0	24
13	KMSP	ABC	13	Minneapolis-St Paul.....	24	0	24
16	KCPX	ABC	50	Salt Lake City.....	25	0	25
16	WSOC	NBC	35	Charlotte.....	25	0	25
16	WHTN	ABC	33	Charleston-Huntingto.....	25	0	25
16	KDVR	ABC	27	Sacramento-Stockton.....	25	0	25
16	WKBW	ABC	25	Buffalo.....	25	0	25
16	WITI	ABC	21	Milwaukee.....	25	0	25
22	WAPT	NBC	38	Birmingham.....	24	1	25
23	KYW	NBC	4	Philadelphia.....	26	0	26
24	KATU	ABC	26	Portland.....	27	0	27
24	KTVI	ABC	12	St. Louis.....	27	0	27
26	WNAC	ABC	6	Boston.....	26	1	27
27	WCHS	CBS	33	Charleston-Huntingto.....	24	3	27
28	KSAT	ABC	45	San Antonio.....	28	0	28
28	WXII	NBC	48	Gnsb-High Pt-WinSal.....	28	0	28
30	KDKA	CBS	9	Pittsburgh.....	29	0	29
31	WSIX	ABC	30	Nashville.....	28	1	29
32	WOAI	NBC	45	San Antonio.....	27	2	29
33	WKRC	ABC	20	Cincinnati.....	30	0	30
33	WTVJ	CBS	18	Miami.....	30	0	30
35	WHAS	CBS	36	Louisville.....	29	1	30
36	WAVY	NBC	44	Norfolk-Newport News-Hampton.....	31	0	31
36	WRGB	NBC	37	Albany-Schenectady-Troy.....	31	0	31
36	WRTV	NBC	14	Indianapolis.....	31	0	31

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Network affiliates ranked by number of composite week hours with more than 12 min of commercials—Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	12-16 min.	Over 16	Total
39	WBAP	NBC	11	Dallas-Fort Worth.....	30	1	31
40	WKY	NBC	41	Oklahoma City.....	29	2	31
41	WSPD	NBC	45	Toledo.....	32	0	32
41	WVEC	ABC	44	Norfolk-Newport News-Hampton.....	32	0	32
41	WGR	NBC	25	Buffalo.....	32	0	32
41	WMAL	ABC	10	Washington, D.C.....	32	0	32
41	WTV	ABC	34	Providence.....	32	0	32
46	WZZM	ABC	41	Kalamazoo-Grand Rapids.....	31	1	32
46	WVUL	ABC	31	New Orleans.....	31	1	32
46	WCKT	NBC	18	Miami.....	33	0	33
49	KTVK	ABC	45	Phoenix.....	33	0	33
49	WHDQ	ABC	29	Memphis.....	33	0	33
49	KGW	NBC	26	Portland.....	33	0	33
49	WSB	NBC	17	Atlanta.....	33	0	33
49	WBZ	NBC	6	Boston.....	33	0	33
49	WABC	ABC	1	New York City.....	33	0	33
55	WBMG	CBS	38	Birmingham.....	31	2	33
56	WBRC	ABC	38	Birmingham.....	29	4	33
57	WTNH	ABC	22	Hartford-New Haven.....	35	0	35
57	WREC	CBS	29	Memphis.....	35	0	35
57	WBEN	CBS	25	Buffalo.....	35	0	35
57	KOMO	ABC	16	Seattle-Tacoma.....	35	0	35
57	KSTP	NBC	13	Minneapolis-St. Paul.....	35	0	35
62	KOIN	CBS	26	Portland.....	33	2	35
63	KUTV	NBC	60	Salt Lake City.....	36	0	36
63	WHNB	NBC	22	Hartford-New Haven.....	36	0	36
63	WIDL	CBS	45	Toledo.....	36	0	36
63	KTAR	NBC	45	Phoenix.....	36	0	36
63	WSM	NBC	30	Nashville.....	36	0	36
63	KTRK	ABC	15	Houston.....	36	1	36
69	WTVN	ABC	28	Columbus.....	37	0	37
70	WJAR	NBC	34	Providence.....	37	0	37
70	WSAZ	NBC	33	Charleston-Huntington.....	37	0	37
70	WWL	CBS	31	New Orleans.....	37	0	37
70	WTEN	CBS	37	Albany-Schenectady-T.....	37	0	37
70	KWTV	CBS	41	Oklahoma City.....	37	0	37
75	KSD	NBC	12	St. Louis.....	36	1	37
75	WFAA	ABC	11	Dallas-Fort Worth.....	36	1	37
77	KORA	NBC	27	Sacramento-Stockton.....	35	2	37
78	WMAR	CBS	19	Baltimore.....	38	0	38
78	WISH	CBS	14	Indianapolis.....	38	0	38
80	KPRC	NBC	15	Houston.....	36	2	38
81	KOCO	ABC	41	Oklahoma City.....	39	0	39
81	WDSO	NBC	31	New Orleans.....	39	0	39
81	KENS	CBS	45	San Antonio.....	39	0	39
81	WCCB	ABC	35	Charlotte.....	39	0	39
81	WBNS	CBS	28	Columbus.....	39	0	39
86	WPLG	ABC	18	Miami.....	38	1	39
87	WLCY	ABC	24	Tampa-St. Petersburg.....	37	2	39
88	KSL	CBS	50	Salt Lake City.....	40	0	40
88	KGTU	NBC	49	San Diego.....	40	0	40
88	WHEN	CBS	43	Syracuse.....	40	0	40
88	WKZO	CBS	41	Kalamazoo-Gr Rapids.....	40	0	40
88	WAVE	NBC	36	Louisville.....	40	0	40
88	WBTU	CBS	35	Charlotte.....	40	0	40
88	KMBC	ABC	23	Kansas City.....	40	0	40
88	WBAL	NBC	19	Baltimore.....	40	0	40
88	WNBC	NBC	1	New York City.....	40	0	40
97	KABC	ABC	2	Los Angeles.....	39	1	40
98	WEWS	ABC	7	Cleveland.....	41	0	41
99	WCPO	CBS	20	Cincinnati.....	40	1	41
99	KGO	ABC	8	San Francisco.....	42	0	42
101	KCMO	CBS	22	Kansas City.....	42	0	42
101	WRC	NBC	10	Washington, D.C.....	42	0	42
101	WJW	CBS	7	Cleveland.....	42	0	42
101	KMOX	CBS	12	St. Louis.....	42	0	42
105	WIBC	NBC	9	Pittsburgh.....	41	1	42
106	WOTV	NBC	41	Kalamazoo-Grand Rapids.....	43	0	43
106	WIMJ	NBC	21	Milwaukee.....	43	0	43
108	KIRO	CBS	16	Seattle-Tacoma.....	44	0	44
108	WCBS	CBS	1	New York City.....	43	1	44
110	KHOU	CBS	15	Houston.....	42	2	44
111	KOA	NBC	32	Denver.....	45	0	45
112	WQXI	ABC	17	Atlanta.....	44	1	45
113	WFLI	ABC	4	Philadelphia.....	45	1	46
114	WMC	NBC	29	Memphis.....	45	1	46
114	WJBK	CBS	5	Detroit.....	45	1	46
116	WLAC	CBS	30	Nashville.....	44	2	46
117	KMGH	CBS	32	Denver.....	47	0	47

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Network affiliates ranked by number of composite week hours with more than 12 min of commercials -Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	12-16 min.	Over 16	Total
117	WTVT	CBS	24	Tampa-St. Petersburg.....	47	0	47
119	WSPA	CBS	40	Gnville-Sptnbg-Ashvl.....	46	1	47
119	WTOP	CBS	10	Washington, D.C.....	46	1	47
121	WAGA	CBS	17	Atlanta.....	48	0	48
121	KDFW	CBS	11	Dallas-Fort Worth.....	48	0	48
121	WKYC	NBC	7	Cleveland.....	48	0	48
121	WCAU	CBS	4	Philadelphia.....	48	0	48
121	KNXT	CBS	2	Los Angeles.....	48	0	48
126	WLWC	NBC	28	Columbus.....	47	1	48
126	KXTV	CBS	27	Sacramento-Stockton.....	47	1	48
128	WISN	CBS	21	Milwaukee.....	46	2	48
129	WWJ	NBC	5	Detroit.....	49	0	49
130	WLWI	ABC	14	Indianapolis.....	48	1	49
131	WLWT	NBC	20	Cincinnati.....	46	3	49
132	WFLA	NBC	24	Tampa-St. Petersburg.....	50	0	50
132	WXYZ	ABC	5	Detroit.....	50	0	50
132	WMAQ	NBC	3	Chicago.....	50	0	50
135	WHIO	CBS	39	Dayton.....	48	2	50
136	KFMB	CBS	49	San Diego.....	47	3	50
137	WLWD	NBC	39	Dayton.....	49	2	51
138	KNBC	NBC	2	Los Angeles.....	52	0	52
139	WCCO	CBS	13	Minneapolis-St. Paul.....	51	2	53
140	KOOL	CBS	45	Phoenix.....	55	0	55
141	WBBM	CBS	3	Chicago.....	56	0	56
142	KBTW	ABC	32	Denver.....	57	1	58
143	WLS	ABC	3	Chicago.....	55	3	58
144	WDAF	NBC	23	Kansas City.....	49	10	59

IV. LOCAL PROGRAMMING

From the beginning, a strong legal and cultural emphasis in American broadcasting has been on local service. The Federal Communications Act of 1934, for example, provides that broadcast licenses should be divided "among the several states and communities as to provide a fair, efficient, and equitable distribution of radio services to each of the same."¹⁹ The Act never mentions networks, except to emphasize that the FCC should watch over their operation,²⁰ and in repeated decisions and rulings since then, both the courts and the FCC have defined television in America as *local* television.²¹

It didn't have to be this way, and in retrospect it would have been more efficient and more profitable for television service to have been national or regional in nature, with superpower stations blanketing the country and "local" service limited only to translating or augmenting the central station's signal. This scheme is used in most of the civilized nations of the world, and indeed, was seriously considered in the United States in what was called DuMont Plan, which the Commission finally rejected in its Sixth Report and Order on Television Allocations in 1952.²² It said:

This Commission . . . believes that on the basis of the Communications Act it must recognize the importance of making it possible . . . for a large number of communities to obtain television assignments of their own. In the Commission's view as many communities as possible *should have the opportunity of enjoying the advantages that derive from having local outlets that will be responsive to local needs.* [emphasis added]²³

¹⁹ 47 U.S.C. § 307(b).

²⁰ 47 U.S.C. § 303(i) gives the Commission authority to "make special regulations applicable to radio stations engaged in chain broadcasting."

²¹ There was a considerable amount of language to that effect in *National Broadcasting Co. v. United States*, 319 U.S. (1943), which upheld the right of the Commission to regulate the practices of the networks.

²² Dockets 8736, 8975, 8976 and 9175, 1 P & F Radio Reg. 91:399 (part 3) (1952).

²³ *Id.*, at paragraph 79.

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This allocation decision was by no means a minor one, either, since it required a far greater chunk of the valuable, limited frequency space than any system of national or regional broadcasting would have required. As the Commission reiterated in the course of its 1960 *en banc* Programming Inquiry, it had long since determined that "the *principal ingredient* of the licensee's obligation to operate his station in the public interest is the diligent, positive and continuing effort by the licensee to *discover and fulfill the tastes, needs and desires* of his community. . . ." ²⁴

Despite this conscious attempt to emphasize local service concerned with local politics, education, sports, entertainment, religion, and so forth, for network affiliates the concept has largely been a failure. The statistical analysis of the local programming of the stations in this study indicates that the average station did little more than 13 hours of local programming in a week—13 hours out of a broadcast week that sometimes stretches to 135 hours and beyond. And with most stations, fewer than one-fourth of all "local" hours were programmed in prime time. The rest of the broadcast week is left to be filled by the network feeding often as much as 17 continuous hours a day with *national* entertainment, news, and sports. Moreover, any gap is often taken up by syndicated programs purchased independently by the local stations—programs like *The Mike Douglas Show* or *The Dating Game*, or old movies.

The networks simply dominate "local" television. Most viewers know their local television stations by channel number, but few identify those channels with *local stations*. The identification tends to be with the network. Without the occasional station "I.D." required by the FCC, the local stations could very well slip into total anonymity.

Variety's Les Brown blames the profit-motive:

It was a noble theory to make the station the basic component of the system and hold it responsible for what it broadcasts, but in practice it has been about as effective as holding the newsstand dealer responsible for what appears in the papers. Like the newsstand operator, all the average station owners really want to do is sell. ²⁵

It is simply cheaper—and, therefore, better business—to let the network provide the programming. For each network program that the local station carries it receives a small percentage of the network's advertising revenue from that program in return. In addition, the network leaves open a number of commercial "spots" within and around the program that the local station can sell. During prime time hours, and for sports events, those benefits can generate a tremendous amount of revenue for the local station—certainly far more than producing and selling a local program. Instead of creating a local program, paying people to produce it and perform in it, and then worrying about selling it to an advertiser, a local station merely carries its network's programming or acquires nationally syndicated programs.

Moreover, an advertiser, whether his product is sold locally or nationally, is far more likely to buy time on a network or syndicated

²⁴ *Report and Statement of Policy Re: Commission En Banc Programming Inquiry*, 25 F.R. 7291, 20 F & F Radio Reg. 1901 (1960).

²⁵ Les Brown, *Television: The Business Behind the Box*, 179 Harcourt Brace Jovanovich, Inc. (1971).

program than on a local program. With "All in the Family," for example, an advertiser knows he has a successful program, he knows how many people he will be reaching, how old they are, and whether they are male or female. With a local program, he seldom can have that information at all, let alone in advance. It's the difference between the favorite and a long-shot in a horse race. Every one of these factors helps explain why there is so little local programming, and even less high quality local programming.

Ranking television stations on the basis of their local programming is particularly difficult. The FCC license renewal form sets out a lengthy definition of a "local program":

... any program originated or produced by the station, or for the production of which the station is primarily responsible and employing live talent for more than 50% of the time. Such a program, taped or recorded for later broadcast, shall be classified as local. A local program fed to a network shall be classified by the originating station as local. All non-network news programs may be classified as local. Programs primarily featuring records or transcriptions shall be classified as recorded even though a station announcer appears in connection with such material. However, identifiable units of such programs which are live and separately logged as such may be classified as local.²⁶

It is a flexible, confusing definition that different stations interpret differently, but it leaves no doubt as to the importance of local programming. In addition to this definition, the Policy Statement attached to the renewal form identifies 14 major elements as "necessary or desirable to serve the broadcast needs of many communities."²⁷ Local programming is necessarily an important part of at least seven of those elements, although only three—news, public affairs, and local programming—are singled out for special attention on the license renewal form.²⁸

In ranking the stations based on their local programming the raw total of hours is used rather than the expression of that total as a percentage of the composite week, for the reasons given in this section on news.²⁹ Two factors from the renewal application are combined to give a total "index" of the licensee's local programming performance. The

²⁶ F.C.C. Form No. 303, Section 4.1, page 1.

²⁷ *Id.*

²⁸ See Part I of this Chapter.

²⁹ See text at page 27 of this Chapter. "Total hours of local programming," for purposes of this report was limited to local programming logged between the hours of 8:00 a.m. and 11:00 p.m. While we would have preferred to have information limited to the hours between 8:00 a.m. and 12:00 p.m. (to account for the half hour of local news broadcast by most network affiliates between the hours of 11:00 p.m. and 11:30 p.m.), we felt it was more important to discourage stations from seeking to improve their "rating" by dumping additional local programming into the virtually viewerless hours of the early morning. As additional justification for ignoring that "traditional" half hour of local news, we would note:

1) this particular programming is generally the same for every network affiliate in the top 50 markets; and
2) It will have already been accounted for under the category "news, public affairs and other."

total hours of local programming and the total hours of local programming in prime time are added to one another and that total divided by two. The stations are then ranked on the basis of that index. Thus, we have given additional significance to the *prime time* local programming factor. Prime time local programming is, in effect, being counted twice—once by itself and once as part of the *total* hours of local programming. This additional weight reflects a conscious judgment on our part that the impact of television should be measured in terms of the number of people it reaches, which number is far greater in prime time than any other time during the broadcast week. For a network affiliate to *program locally* in prime time, other than during the half hour "returned" under the prime time access rule,³⁰ requires a greater degree of commitment to the local viewing public as well as to the local advertiser. While counting the prime time local twice may be arbitrary, in view of the considerably greater number of viewers during prime time, we feel it is a legitimate and conservative additional weighting.³¹

The over-all results of the survey of local programming are not encouraging. With but few exceptions, local network affiliates pay little attention to local programming and even less attention to local programming in prime time. And the Commission, rather than set standards for further scrutiny in this area it has supposedly considered so important for so long, continues to look the other way at renewal time.

³⁰ 47 CFR § 658(k).

³¹ One problem encountered in this analysis was the precise definition of "prime time." In some central and mountain time zone states, for example, prime time actually runs from 5:00 PM to 10:00 PM instead of 6:00 PM to 11:00 PM. While the recently adopted license renewal form specifically takes that phenomenon into effect, all the data we have gathered has been subject to the interpretation of "prime time" by the licensee. It has not appeared to have a major effect on the analysis, but should be borne in mind especially when considering the local programming segment of this report.

Network affiliates ranked by local programming

Rank	Call letters	Net. aff.	Mkt. No.	Location	Prime time local and rank	Local programming and rank	Composite
1	WJMT	NBC	20	Chicoutimi	6.17	35.67	20.917
2	KYWB	NBC	4	Philadelphia	6.00	25.42	15.708
3	KNBC	NBC	2	Los Angeles	8.00	21.92	14.998
4	KDKA	CBS	17	Pittsburgh	6.02	19.89	14.880
5	WSB	NBC	17	Atlanta	6.02	19.89	14.880
6	WJZ	CBS	31	New Orleans	8.53	19.45	13.992
7	WFLA	NBC	45	Phoenix	8.00	17.92	13.750
8	KTLA	NBC	5	Detroit	6.52	18.92	13.458
9	WJL	NBC	18	Miami	4.53	22.02	13.408
10	WFLG	CBS	19	Baltimore	7.42	19.03	13.275
11	WMAR	CBS	13	Minneapolis-St. Paul	8.92	17.25	13.225
12	WCO	NBC	21	Milwaukee	8.00	17.95	13.093
13	WTMJ	NBC	4	Philadelphia	4.00	21.92	12.975
14	WPVI	NBC	6	Boston	6.00	18.83	12.958
15	WBZ	NBC	41	Pittsburgh	6.36	18.83	12.958
16	WKY	NBC	15	Houston	6.50	17.90	12.958
17	WTKR	NBC	19	Baltimore	7.80	17.90	12.958
18	WTKR	NBC	31	New Orleans	7.50	17.58	12.958
19	WBAL	NBC	2	Los Angeles	6.50	18.55	12.958
20	WDSU	NBC	28	Columbus	6.67	18.33	12.958
21	KNXT	CBS	38	Birmingham	5.23	19.02	12.958
22	WBNS	CBS	30	Nashville	7.02	17.00	12.958
23	WSM	CBS	15	Houston	6.03	18.25	12.958
24	KHOU	CBS	11	Dallas-Fort Worth	7.07	18.25	12.958
25	KDFW	CBS	17	Sacramento-Salt Lake	7.07	18.25	12.958
26	KRA	NBC	10	Washington D.C.	3.50	20.07	12.958
27	KRA	NBC	15	Houston	7.82	15.93	11.793
28	KPRC	NBC	39	Dayton	5.50	17.53	11.793
29	WLAD	CBS	8	San Francisco	7.00	16.90	11.667
30	KPIX	CBS	16	Seattle-Tacoma	6.00	16.98	11.667
31	KOMO	CBS	3	Chicago	7.73	15.23	11.492
32	WBMM	CBS	23	Kansas City	6.50	16.15	11.483
33	WDAF	NBC	36	Louisville	5.57	17.35	11.476
34	WHAS	CBS	12	St. Louis	6.50	16.33	11.458
35	KSD	NBC	6	Boston	3.00	17.38	11.417
36	WNAE	NBC	6	Boston	3.00	17.38	11.417
37	WNAE	NBC	6	Boston	3.00	17.38	11.252

Arkansas, Louisiana and Mississippi 1973 Renewals

35

38 WMC	NBC	29 Memphis	7.00	21	15.47	48	11,223
39 WLAC	CBS	30 Nashville	6.92	23	15.00	55	10,958
40 WCPO	CBS	27 Cincinnati	4.00	80	17.75	25	10,875
41 WMAQ	NBC	3 Chicago	4.15	78	17.57	29	10,868
42 WCAU	CBS	4 Philadelphia	6.00	46	15.58	44	10,792
43 KSTP	NBC	13 Minneapolis-St. Paul	6.52	27	15.00	55	10,768
44 KMGH	CBS	32 Denver	6.27	38	15.07	54	10,667
45 WHIO	CBS	39 Dayton	6.00	46	15.30	51	10,640
46 WFAA	NBC	35 Charlotte	3.70	55	15.53	48	10,617
47 WFTV	NBC	41 Kansas City	5.00	70	15.00	42	10,469
48 WTCV	NBC	10 Washington D.C.	6.00	76	15.90	42	10,467
49 KATU	NBC	36 Portland	4.97	46	14.92	58	10,458
51 KFMB	CBS	40 San Diego	5.00	73	15.95	41	10,458
52 WTAE	NBC	9 Pittsburgh	3.42	70	15.50	47	10,250
53 WLS	NBC	3 Chicago	7.93	101	16.78	34	10,100
54 KCMO	CBS	23 Kansas City	7.58	19	13.10	74	10,067
55 WBEW	CBS	25 Buffalo	3.50	91	12.50	76	10,042
56 KOA	NBC	32 Denver	4.67	75	13.42	49	10,042
57 KSLA	NBC	40 Salt Lake City	6.13	43	13.88	64	10,006
58 WMAI	NBC	45 San Antonio	6.50	36	13.42	62	9,956
59 KMOX	NBC	12 St. Louis	6.97	36	13.42	62	9,872
60 WLCY	NBC	1 New York City	6.00	46	13.67	66	9,833
62 KOCO	NBC	24 Tampa-St. Petersburg	1.83	127	17.83	23	9,833
63 WABC	NBC	41 Oklahoma City	3.75	87	15.57	45	9,658
64 WLVI	NBC	1 New York City	5.28	64	13.62	67	9,500
65 WKTV	NBC	14 Indianapolis	5.17	68	13.75	65	9,458
66 KIRO	NBC	14 Indianapolis	5.50	57	13.42	71	9,458
67 KTVB	NBC	16 Seattle-Tacoma	3.83	85	14.92	58	9,273
68 KTVB	NBC	26 Portland	3.00	108	15.42	49	9,206
69 WJW	NBC	22 Hartford-New Haven	3.10	69	15.20	73	9,150
70 WAGA	NBC	17 Cleveland	2.55	117	15.28	82	9,117
71 WCKT	NBC	17 Miami	5.50	57	13.42	82	9,086
73 WISH	NBC	18 Milwaukee	6.00	29	11.42	77	8,958
74 WKRC	NBC	14 Indianapolis	2.77	84	11.82	84	8,958
75 WCBS	NBC	20 Cincinnati	6.50	46	14.95	57	8,858
76 KING	NBC	1 New York City	3.45	119	11.00	88	8,750
77 KWTW	NBC	16 Seattle-Tacoma	6.75	24	14.05	61	8,750
78 KBBW	NBC	41 Oklahoma City	3.50	91	13.92	92	8,733
79 WTVT	NBC	25 Buffalo	4.25	37	11.10	96	8,708
80 WTNH	NBC	20 Washington D.C.	4.25	40	10.80	90	8,692
		24 Tampa-St. Petersburg	4.25	40	10.80	90	8,655
		22 Hartford-New Haven	3.03	107	13.48	98	8,256

Network affiliates ranked by local programming—Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	Prime time local and rank	Local programming and rank	Composite
82	WSIX	ABC	30	Nashville	4.52	11.82	8.167
83	KUTV	NBC	50	Salt Lake City	6.02	10.17	8.692
84	KOIN	CBS	26	Portland	3.90	12.13	8.015
85	WCHS	CBS	33	Charleston-Huntington	2.50	13.47	7.840
86	KTVI	ABC	12	St. Louis	2.50	13.25	7.877
87	WTOL	CBS	45	Toledo	5.50	10.18	7.842
88	KTVK	ABC	45	Phoenix	2.80	11.8	7.800
89	KSNV	ABC	45	Detroit	5.90	12.80	7.750
90	KSNV	ABC	45	San Antonio	4.50	10.00	7.750
91	KSNV	ABC	45	Detroit	4.50	10.17	7.750
92	WFSB	ABC	32	Detroit	4.50	10.17	7.750
93	WJBL	ABC	7	Cleveland	4.00	10.82	7.750
94	KGO	ABC	8	San Francisco	3.98	11.08	7.750
95	WAVE	NBC	26	Louisville	3.00	11.42	7.750
96	WFMY	CBS	48	Gnsb-High Pt-Win Sal.	4.00	10.42	7.750
97	WISN	CBS	21	Milwaukee	4.77	9.55	7.750
98	KOOL	CBS	45	Phoenix	5.50	8.82	7.750
99	WLWG	NBC	28	Columbus	3.25	10.67	6.958
100	KTVB	NBC	37	Albany-Schenectady-T.	3.50	10.42	6.917
101	KTVB	NBC	37	Albany-Schenectady-T.	3.50	8.23	6.917
102	KMBC	ABC	23	Sacramento-Stockton	3.00	10.38	6.775
103	WSPA	CBS	40	Greenville-Spartanburg-Ashv.	3.20	10.38	6.775
104	WFB	NBC	40	Greenville-Spartanburg-Ashv.	3.00	10.12	6.700
105	WTVJ	CBS	18	Miami	4.02	9.38	6.700
106	KENS	CBS	45	San Antonio	3.68	9.53	6.698
107	WVUE	ABC	31	New Orleans	5.23	7.93	6.593
108	WKZO	ABC	41	Kalamazoo-Gr Rapids	3.00	10.08	6.542
109	KMSP	ABC	13	Minneapolis-St Paul	3.08	9.95	6.517
110	WTEN	CBS	37	Albany-Schenectady-T.	3.00	10.00	6.500

111	KGTV	NBC	40	San Diego	3.90	91	9.42	111	6.488
112	WZLW	ABC	41	Kalamazoo-Gir Rapids	0.75	133	12.00	79	6.375
113	WKYC	NBC	42	Cleveland	3.50	91	8.12	114	6.333
114	WJAR	NBC	7	Providence	3.50	91	8.83	117	6.167
115	WPRI	NBC	34	Providence	3.50	91	8.67	121	6.083
116	WHNB	NBC	34	Hartford-New Haven	3.33	102	8.77	119	6.040
117	WSYR	NBC	22	Syracuse	2.50	102	8.60	119	6.040
118	WXII	NBC	43	Charlotte	3.00	108	8.92	116	5.958
119	WFAZ	NBC	33	Charleston-Huntington	3.53	108	8.42	135	5.750
120	WFLA	NBC	33	Charleston-Huntington	3.00	108	7.67	135	5.750
121	WFTS	NBC	34	Tampa-St. Petersburg	3.80	91	7.22	128	5.750
122	WFSB	NBC	44	Norfolk-Newsp. Hamp.	3.00	91	7.32	131	5.667
123	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
124	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
125	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
126	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
127	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
128	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
129	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
130	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
131	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
132	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
133	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
134	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
135	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
136	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
137	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
138	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
139	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
140	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
141	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
142	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
143	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667
144	WISN	NBC	35	Charlotte	3.00	108	8.17	131	5.667

V. CONFIDENTIAL FINANCIAL INFORMATION

We believe that financial information is of special relevance in evaluating stations' programming performance. To the extent that "quality" or "local" programming costs more than old movies, a station's gross revenues, profit, and programming expenses are relevant in evaluating whether more should be expected of the station. Thus, it would often be of advantage to poorer stations to make this information public. Financial information is traditionally available for public utilities and other companies regulated by government. Getting financial information from the FCC is, however, another matter.

The Commission originally collected financial information from broadcast licensees as a way of enabling the government to keep up with the growth and development of a relatively new communications industry. It was thought that the data would be of importance to the broadcasters themselves. Even today the Commission accumulates and publishes market-by-market reports of revenues and expenditures for the industry.

Over the years the Commission has gradually expanded its use of this information into more substantive policy areas. Profits are deemed relevant, for example, in determining how much a station should be fined for a violation of Commission rules. It is used to determine whether a market can sustain economically an additional radio or television station. It can be used in change of format cases to support (or challenge) the argument of a licensee that significant losses justify a different programming format.

It is our contention that financial information should also be used in determining whether a licensee has met its obligation to operate in the "public interest, convenience or necessity." Specifically, the amount of money spent on programming, particularly local programming, compared to the station's profits, or gross revenues, can be a valid indicator of its commitment to public service. Our premise is that a station spending a greater percentage of its revenues on local programming is doing a better job, and accordingly we have included a financial factor designed to reflect a licensee's performance as a fourth (and final) input into our overall programming ranking.

There are, of course, severe limitations upon the effective use of financial information in a report of this nature. Despite the fact that all licensees are required to file financial forms annually, there is no uniform system of accounts; so there is no necessary consistency between licensees' reports. Nor does the Commission do an audit on the information it receives; so there is no guarantee of accuracy. Furthermore, the information currently required is not particularly detailed or specific. For example, it is impossible to tell how much of its total program expenses have been spent by a licensee on locally-originated programming or live-on-air talent, as opposed to extensive libraries of old movies.

Perhaps the most significant obstacle to the analysis of this information, however, is its confidentiality. This has made it exceedingly difficult for the Commission staff to analyze and report our findings in the context of this study. And it makes it virtually impossible for a concerned citizens group accurately to gauge the performance of a licensee.

On March 23, 1938, under the authority of the Communications Act of 1934³² and the Rules³³ the Commission ordered that each licensee of a broadcast station³⁴ file information about its earnings and expenditures.³⁵ In April, 1945, the Commission, in seeking to update the rules regarding the filing of financial data, also invited comments as to whether any or all of the information required to be filed should be open for public inspection.³⁶ In August of that year the proposed rules were adopted, including for the first time a very limited public disclosure provision commented upon by Commissioner Clifford Durr as follows:

... the amended rules are a move in the right direction, but in my opinion they stop far short of making available to the public information to which it is properly entitled. Section 1.5 still withholds from public scrutiny balance sheets and income statements of broadcasting licensees filed with the Commission pursuant to Section 1.301 and network and transcription service contracts filed pursuant to Section 1.302. It is true that the Commission ... announced "that it is giving consideration to expanding its annual statistical report so that the report will contain certain financial data with respect to the operations of individual stations." This, too, gives promise of a further move in the right direction, but I can see no reason for giving the public less than complete information.³⁷

In 1960 the Commission staff undertook extensive revision of the annual financial report with the purpose of obtaining more detailed, current data on all stations. A Notice of Proposed Rulemaking was adopted and published in November 1960,³⁸ and the currently applicable financial Form 324 was adopted in a Memorandum Order and Opinion in January of 1963.³⁹ The comments received in the course of the proceeding mainly spoke of the additional burdens on the licensees to furnish more complete information. The question of confidentiality was not fully considered. The information collected on April 1 of each year remains "confidential," subject of the provisions of August, 1945, its disclosure permitted only upon a "substantial showing of relevancy and need."⁴⁰

Two provisions of the Public Information Act of 1966 are pertinent to the Commission's authority to disclose or withhold confidential financial information: 5 U.S.C. § 552 provides that the general requirement of each administrative agency to "make available to the public" certain types of information does not apply to "... trade secrets and commercial or financial information obtained from a person and privileged or confidential." Notwithstanding this language, § 552 does not *prohibit* the disclosure of such financial information; it

³² 47 U.S.C. § 308(b).

³³ Then numbered § 1.341 of the Commission rules. Today that authorization may be found at 47 CFR § 1.611.

³⁴ *Id.* Today the language requires the reports of "each licensee or permittee of a commercially operated standard, FM, television or international broadcast station (as defined in Part 73 of this chapter)." ...

³⁵ At that time the forms were 705 and 706 and were labelled "Annual Financial Report for Standard Broadcast Stations and Networks." By 1940, Section 1.341, note 33 *supra*, was deleted and redesignated Section 1.361. In August 1943, Section 1.361 was revised and forms were thereafter referred to as 324, 328, and 329. Information regarding ownership, operation, interests and contracts was also required by that date.

³⁶ In the Matter of Promulgation of Rules and Regs. Concerning the Filing of Financial Ownership and Other Reports of Broadcast Licensees, Docket 6756, 10 Fed. Reg. 4364 (1945).

³⁷ Memorandum of Commissioner Clifford Durr, dated August 3, 1945.

³⁸ 25 Fed. Reg. 10738 (1960).

³⁹ 28 Fed. Reg. 36 (1963).

⁴⁰ See 47 CFR § 0.451, 0.457, 0.461 (1968): *Multivision Northwest, Inc.*, 8 F.C.C. 2d 892, *aff'd on reconsideration*, 10 F.C.C. 2d 391 (1967).

merely exempts it from *compulsory* disclosure, leaving the release of financial information to the discretion of the agency. The Commission has explicitly recognized this discretionary authority in the text of its rule,⁴¹ which states that the Commission is "authorized to withhold"—not *prevented* from withholding—such confidential information under Federal law.

The second pertinent provision of the U.S. Code is contained in 18 U.S.C. § 1905, which provides in part:

Whoever, being an officer or employee of the United States or any department or agency thereof, publishes, divulges, discloses, or makes known in any manner or to any extent *not authorized by law* any information coming to him in the course of his employment or official duties . . . which information concerns or relates to . . . the identity, confidential statistical data, amount or source of any income, profits, losses, or expenditures of any person, firm, partnership, corporation, or association; or permits any income return or copy thereof . . . to be seen or examined by any person *except as provided by law*; shall be fined. . . . [emphasis added]

Once again, Section 1905 does not bar an agency from releasing otherwise confidential financial information. It merely imposes sanctions for the "unauthorized" release of such information—that is, in a manner not approved by the agency in its official capacity. As the Court explained in *Consumers Union of U.S., Inc. v. Veterans Administration*, 425 F.2d 578 (D.C. Circuit 1970):

Unlike other statutes which specifically define the range of disclosable information. . . . Section 1905 merely creates a criminal sanction for the release of "confidential information." Since this type of information is already protected from disclosure under the Act by § 552(b)(4), Section 1905 should not be read to expand this exemption, especially because the Act requires that exemptions be narrowly construed, 5 U.S.C. § 552(c) (Supp. IV, 1969).⁴²

The scope of Section 1905, therefore, is governed by that of Section 552, which, in turn, leaves disclosure to the discretion of the individual agency. Where the "public interest" is concerned, the Public Information Act and its legislative history has been interpreted to place on the government agency the burden of justifying denials of disclosures:

This law was initiated by Congress and signed by the President with several key concerns: (a) that disclosure be the general rule, not the exception; (b) that all individuals have equal rights of access; (c) that the burden be on the Government to justify the withholding of a document, not on the person who requests it. . . .⁴³

The Commission rules contain its principal guidelines on non-disclosure of confidential information:

The Commission is authorized to withhold from public inspection materials which would be privileged as a matter of law if retained by the person who submitted them and materials which would not customarily be released to the public by that person, whether or not such materials are protected from disclosure by a privilege.⁴⁴

In the same Section, the Commission goes on to include the following material in non-public status: "(i) Financial reports submitted by

⁴¹ 5 U.S.C. § 552(b)(4).

⁴² 47 CFR § 0.457(d).

⁴³ 425 F.2d 578 (D.C. Circuit 1970).

⁴⁴ See Memorandum of the Attorney General on the Public Information Act, 96-10 (June 1967); See also Amendment of Part 0, Rules and Regulations, 8 F.C.C. 2d 908 (1967).

licensees of broadcast stations pursuant to § 1.611 of this chapter or by radio and television networks.⁴⁵

Although the Commission's rules permit the disclosure of confidential financial information upon a "persuasive showing as to the reasons for inspection of such materials,"⁴⁶ this "persuasive showing" is difficult for the average citizens group. The Commission's procedures, for example, may require three separate rounds of pleadings: the first to obtain an initial ruling from the Commission's Executive Director; a second to seek review by the full Commission; and a third to obtain judicial review of Commission denials of disclosure.⁴⁷ Months can pass before the Commission issues a final ruling suitable for judicial review.⁴⁸ Faced with these obstacles, inexperienced petitioners are highly unlikely to prevail even if they are able to follow the prescribed procedures.⁴⁹

There have been three significant recent tests of the right of the Commission to withhold confidential financial information from public groups seeking to use that information to assess the relative performance of broadcast licensees: the *Alianza* case, the *KTTV/Metromedia* Commission proceeding, and the Stern Community Law Firm petition for a change in Commission rules.

In the *Alianza* case,⁵⁰ the D.C. Circuit Court of Appeals upheld the refusal of the Commission to disclose the annual financial reports of three Albuquerque, New Mexico, television stations to an organization of Mexican-Americans who claimed the reports would be helpful to it in deciding whether to oppose the stations' license renewals.⁵¹ The Commission decided the release turned upon "the reasonable necessity for petitioners having the information, the position of the station in the proceeding involved, the inability to obtain the requested information from other sources, and the relevancy and materiality of the information sought."⁵²

Alianza contended that its request met the Commission's qualifications for disclosure. Before the Commission can review a television broadcast license, the group alleged, it must find that the station's past three-year performance has sufficiently served the "public interest, convenience, and necessity." A critical element in judging past performance under that standard is the past programming. Discussing one criterion in evaluating past programming, *Alianza* stated: "there no longer seems any question that the adequacy of a station's programming must be judged in substantial part by the extent to which it re-

⁴⁵ 47 C.F.R. § 0.457(d)(1) (1969).

⁴⁶ *Id.* Indeed, the Commission has exercised its discretion on numerous occasions, releasing otherwise confidential information for "public interest" reasons. *See, e.g., Cape Cod Broadcasting Co., Inc.*, 23 F.C.C. 2d 271 (1970); *Fetzer Cable Vision*, 11 F.C.C. 2d 516 (1968); *MultiVision Northwest, Inc.*, 8 F.C.C. 2d 892 (1967); *aff'd on reconsideration*, 10 F.C.C. 2d 391 (1967); *cf. Sioux Empire Broadcasting Co.*, 10 F.C.C. 2d 132 (1967).

⁴⁷ See the procedure outlined in 47 C.F.R. § 0.461, "Requests for inspection of materials not routinely available for inspection."

⁴⁸ *See, e.g., Request by Reuben B. Robertson*, 25 F.C.C. 2d 942 (1970) (more than two months taken to resolve a simple inspection request).

⁴⁹ *See, e.g., McKeon Construction Co.*, 27 F.C.C. 2d 879 (1971); *KOWL, Inc.*, 24 F.C.C. 2d 305 (1970); *cf. Sioux Empire Broadcasting Co.*, 10 F.C.C. 2d (1967).

⁵⁰ *Alianza Federal de Pueblos Libres v. Federal Communications Commission*, 25 P & F Radio Reg. 2d 20001 (D.C. Circuit 1972).

⁵¹ See the Commission's original *Alianza* decision, 31 F.C.C. 2d 537 (1971). *See also Sioux Empire Broadcasting Co.*, 10 F.C.C. 2d 132, 134 (1967).

⁵² *KOWL, Inc.*, 24 F.C.C. 2d 305 (1970). A fuller discussion of the confidential treatment accorded to annual financial reports and of past treatment of similar requests may be found at 24 F.C.C. 2d 306.

invests an adequate percentage of its profits into locally originated and community-oriented programming." Alianza maintained further that a broadcaster is a "public trustee," whose profits derive from the use of publicly-owned property. The public, it asserted, is entitled to a "fair return" on their investment in the nature of programming. This "fair return" is the value of the programming benefits received by the public expressed as a function of profits. Consequently the profit figures and programming expenditures contained in FCC forms 324 are necessary to determine the "fair return."⁵³

The Court of Appeals, in a brief *per curiam* opinion upholding the Commission's contention that Alianza's arguments were not sufficiently substantial to warrant disclosure, merely accepted the Commission's argument that

the issue of financial disclosure is prematurely before the court . . . because the licensee may be denied renewal for deficient public service programming without reference to financial circumstances, or, in any hearing which the Commission may hold, disclosure may become necessary if the licensee attempts to justify inadequate public service programming by reference to its financial necessities.⁵⁴

"In any event," the court concluded, "if renewal is granted, petitioner may seek review of that action in this court and urge as error the Commission's handling of the financial disclosure question."⁵⁵

The second major recent landmark in the area of financial disclosure was the request by Citizens Communications Center for inspection of the financial reports of Metromedia, Inc., licensee of KTTV-TV, Los Angeles, California,⁵⁶ decided just one month after *Alianza*. In *KTTV* the Commission chose to uphold the decision of its Executive Director to allow Citizens Communication Center, on behalf of the National Association for Better Broadcasting and others, to examine the licensee's financial reports for the years 1969, 1970 and 1971. Metromedia, in response to various petitions to deny the renewal of its KTTV license, has asserted that the Commission should examine its programming performance "in the light of its income picture compared to the huge profits of the three network owned stations," and also that "Commission records reflect that . . . the 'large profits' in this market are being made by the network owned stations. The rate of return for Metromedia on capital invested in KTTV has been less than the Commission permits a public utility to make."⁵⁷ The Commission felt that these assertions relied sufficiently upon the confidential information contained in the financial reports to require the disclosure of that information to the petitioners to deny.⁵⁸

The *Alianza* and *KTTV* cases epitomize the case-by-case approach the Commission has been taking with regard to disclosure of financial

⁵³ As authority for its argument, Alianza cites *Wichita-Hutchinson Co., Inc.*, 19 F.C.C. 2d 433 (1969), a case involving the transfer of KTVH-TV in Hutchinson, Kansas, to the owner of WKY-TV, in Oklahoma City. In that case, the Commission compared the two stations' percentages of programming expenditures to profits and gross revenue to attempt to determine if the transferee would better serve the public interest than the transferor. Alianza also cited *Citizens Communications Center v. FCC*, 447 F.2d 1201 (D.C. Circuit, June 11, 1971) in which the Court suggested that "... one test of superior service should certainly be whether and to what extent the incumbent has reinvested the profit on his license to the service of the viewing and listening public."

⁵⁴ *Alianza*, *supra* note 51, 25 R.R. 2d at 20002.

⁵⁵ *Id.*

⁵⁶ FCC 72-1068 (Released December 1, 1972).

⁵⁷ *Id.*, at pp. 2-3.

⁵⁸ In so holding the Commission pointed to a series of analogous cases, including *Multivision, et al*, *supra* note 47.

information; in neither case was there any cogent discussion of the value of making *all* financial reports available to the public as Commissioner Durr had suggested in his Memorandum some 28 years ago. In the course of oral argument of the *Alianza* case before the Court of Appeals, however, the FCC *did* go on record with the assertion that *if* all financial information were to be made public, it should be done in a formal rulemaking and not in the course of resolving an individual case.

The Stern Community Law Firm, counsel for Alianza in that dispute, took the Commission at its word and proceeded to file a petition for just such a rulemaking, looking toward the adoption of rules (1) to permit public inspection of all FCC forms 324, "Annual Financial Report of Networks and Licensees of Broadcast Stations" at the offices of the Commission and at the offices of individual networks and broadcast licensees, and (2) to amend FCC form 324 to require each broadcast licensee to list its programming expenditures in four programming categories—news, public affairs, all other (excluding entertainment and sports), and total local programming.

Earlier this year the Commission staff, obviously feeling somewhat boxed in by its position in the *Alianza* oral argument, brought up a Notice of Proposed Rulemaking, based on the Stern petition, for Commission consideration.⁵⁹ While the Notice proposed no specific amendments to existing Rules, it did invite comments on the Stern Firm suggestions and indicated an open mind rather than any specific position on the proposed changes. The Commission majority was not nearly so troubled, however, by the considerations of inconsistent prior positions, and it quickly consigned the proposal to an early demise, with clear instructions to the staff to withdraw its proposed Notice and substitute a decision denying the Stern Firm petition. The latter document has not yet come up for consideration, but one would have to assume that the cumbersome case-by-case process will continue to be the law in this area, and that the result will be simply to ensure that future licensees will no longer attempt to defend themselves on financially-based grounds.⁶⁰

The form 324 financial information, while not available to the seminar students, was available to members of the Commissioner's staff. It has been utilized in preparing this report in such fashion as not to reveal any information still currently held to be confidential.⁶¹

Ideally, we would have preferred to rank the stations in this report by reporting their total "programming expenses" in dollars (the only "programming" item listed separately on form 324, a sample of which is included at the end of this Part) and their profit. This could be expressed as a ratio. We were unable to do this for a variety of reasons. For one, it would have been difficult to rank the stations in such a manner without revealing something more than we feel we are allowed by law to reveal. In addition, a small handful of the stations on our list reported no profit at all, and any ranking based on a program expenses

⁵⁹ Unreleased staff memorandum.

⁶⁰ Even though this document was never publicly released, I discuss it here because I recorded a dissenting vote to the decision to "recommit" the staff document for modification.

⁶¹ It is possible, however, for a member of the public to obtain complete financial information, in totals for any *three* stations in a broadcasting market.

to profit ratio would have necessarily eliminated those stations. Nevertheless, we feel such a ranking would be useful if and when the financial information is ever made available to the public.

The method we have chosen to use, and the basis for the table below, is simply to rank the stations in the study on the basis of programming expenses as a percentage of gross revenues. This method leaves much to be desired, primarily because of the differences in methods of accounting and the lack of specificity in the figures reported, but this is the only information available to the Commission, and we feel it can be significant in a relative perspective. That is, the station that can be shown to be spending 47% of its gross revenues on programming is, we feel, doing a better job than the station spending just 25% of its revenues. The stations have been ranked, then, on the basis of that factor, although the table eliminates any reference to either the dollar figures or even the percentages involved.⁶²

Network Affiliates Ranked by the Ratio of Program Expenses/Gross Revenues

Rank	Call letters	Net. aff.	Mkt. No.	Location
1	WABC	ABC	1	New York City
2	KGW	NBC	25	Portland
3	KING	NBC	16	Seattle-Tacoma
4	WAST	ABC	37	Albany-Schenectady-T
5	KOVR	ABC	27	Sacramento-Stockton
6	KSL	CBS	50	Salt Lake City
7	WRC	NBC	10	Washington, D.C.
8	WHIC	NBC	9	Pittsburgh
9	WMAL	ABC	10	Washington, D.C.
10	WSYR	NBC	43	Syracuse
11	KUTV	NBC	50	Salt Lake City
12	KOIN	CBS	26	Portland
13	KATU	ABC	26	Portland
14	WZZM	ABC	41	Kalamazoo-Gr Rapids
15	WTAE	ABC	9	Pittsburgh
16	WSM	NBC	30	Nashville
17	KABC	ABC	2	Los Angeles
18	WNYB	ABC	43	Syracuse
19	KTVI	ABC	12	St. Louis
20	WHAS	CBS	36	Louisville
21	WXII	NBC	48	Greensboro-High Pt-Win Sal
22	WSIX	ABC	30	Nashville
23	WLKY	ABC	36	Louisville
24	WJZ	ABC	19	Baltimore
25	KWTV	CBS	41	Oklahoma City
26	WKYC	ABC	5	Detroit
27	WCBS	CBS	1	New York City
28	KOMO	ABC	16	Seattle-Tacoma
29	WDHO	ABC	45	Toledo
30	KGO	ABC	8	San Francisco
31	WWL	CBS	31	New Orleans
32	WTEV	ABC	34	Providence
33	WCPO	CBS	20	Cincinnati
34	WVUE	ABC	31	New Orleans
35	KNBC	NBC	2	Los Angeles
36	KMOX	CBS	12	St. Louis
37	WLWI	ABC	14	Indianapolis
38	KSAT	ABC	45	San Antonio
39	WTEN	CBS	37	Albany-Schenectady-T
40	KCPX	ABC	50	Salt Lake City
41	WITI	ABC	21	Milwaukee
42	KFTV	ABC	32	Denver
43	WKYC	NBC	7	Cleveland
44	WLWT	NBC	20	Cincinnati
45	WPVI	ABC	4	Philadelphia
46	WTVJ	CBS	18	Miami
47	WSOC	NBC	35	Charlotte
48	KTAR	NBC	45	Phoenix

⁶² That percentage was used, however, in the computer analysis to determine more accurately the stations' relative positions. See the more detailed discussion of the methodology in Appendix A.

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Network Affiliates Ranked by the Ratio of Program Expenses/Gross Revenues—Cont.

Rank	Call letters	Net. aff.	Mkt. No.	Location
49	WLAC	CBS	30	Nashville
50	WTOP	CBS	10	Washington D.C.
51	WTVT	CBS	24	Tampa-St. Petersburg
52	WFLG	ABC	18	Miami
53	KOCO	ABC	41	Oklahoma City
54	WHEN	CBS	43	Syracuse
55	WDSU	NBC	31	New Orleans
56	WEWS	ABC	7	Cleveland
57	KDKA	CBS	9	Pittsburgh
58	WNBC	NBC	1	New York City
59	WNAC	ABC	6	Boston
60	WLOS	ABC	40	Gville-Sptnbg-Ashvi
61	WBNS	CBS	28	Columbus
62	KGTU	NBC	49	San Diego
63	WAPT	NBC	38	Birmingham
64	WRTV	NBC	14	Indianapolis
65	WBBM	CBS	3	Chicago
66	KXTV	CBS	27	Sacramento-Stockton
67	WOTV	NBC	41	Kalamazoo-Gir Rapids
68	WLS	ABC	3	Chicago
69	KCRA	NBC	27	Sacramento-Stockton
70	WKY	NBC	41	Oklahoma City
71	KSTP	NBC	13	Minneapolis-St Paul
72	WCCO	CBS	13	Minneapolis-St Paul
73	WCAU	CBS	4	Philadelphia
74	WLAQ	NBC	3	Chicago
75	KTVK	ABC	45	Phoenix
76	WFMY	CBS	48	Gnsb-High Pt-Win Sal
77	WJW	CBS	7	Cleveland
78	WFLA	NBC	24	Tampa-St. Petersburg
79	WAGA	CBS	17	Atlanta
80	WBEN	CBS	25	Buffalo
81	WGR	NBC	25	Buffalo
82	WISN	CBS	21	Milwaukee
83	WLWD	NBC	39	Dayton
84	WAYV	NBC	44	Norfolk-Newp News-Hamp
85	WFAA	ABC	11	Dallas-Fort Worth
86	WAVE	NBC	36	Louisville
87	WHIO	CBS	39	Dayton
88	KNXT	CBS	2	Los Angeles
89	WTMJ	NBC	21	Milwaukee
90	KMBC	ABC	23	Kansas City
91	WJAR	NBC	34	Providence
92	WMC	NBC	29	Memphis
93	WOAI	NBC	45	San Antonio
94	KPRC	NBC	15	Houston
95	WVEC	ABC	44	Norfolk-Newp News-Hamp
96	WLCY	ABC	24	Tampa-St. Petersburg
97	KCMO	CBS	23	Kansas City
98	KMGH	CBS	32	Denver
99	WQXI	ABC	17	Atlanta
100	KIRK	ABC	15	Houston
101	WBAL	NBC	19	Baltimore
102	WHTN	ABC	33	Charleston-Huntington
103	KPIX	CBS	8	San Francisco
104	WMAR	CBS	19	Baltimore
105	WTNH	ABC	28	Columbus
106	WJBK	CBS	5	Detroit
107	WSPD	NBC	45	Toledo
108	KSD	NBC	12	St. Louis
109	WKBW	ABC	25	Buffalo
110	WTIC	CBS	22	Hartford-New Haven
111	WHBQ	ABC	29	Memphis
112	WWJ	NBC	5	Detroit
113	WPRI	CBS	34	Providence
114	WREC	CBS	29	Memphis
115	WBAP	NBC	11	Dallas-Fort Worth
116	WSB	NBC	17	Atlanta
117	WCKT	NBC	18	Miami
118	WLWC	NBC	28	Columbus
119	KOOL	CBS	45	Phoenix
120	WBTU	CBS	36	Charlotte
121	WSFA	CBS	40	Gville-Sptnbg-Ashvi
122	WTOL	CBS	45	Toledo
123	KYW	NBC	4	Philadelphia
124	WTNH	ABC	22	Hartford-New Haven
125	KIRO	CBS	16	Seattle-Tacoma
126	KMSP	ABC	13	Minneapolis-St. Paul
127	KHOV	CBS	15	Houston

Network Affiliates Ranked by the Ratio of Program Expenses/Gross Revenues—Cont.

Rank	Call letters	Net. aff.	Mkt. no.	Location
128	KFMB	CBS	49	San Diego
129	WRGB	NBC	37	Albany-Schenectady-T
130	WFBC	NBC	40	Groville-Spring-Ashvi
131	WDAF	NBC	23	Kansas City
132	KOA	NBC	32	Denver
133	WKRC	ABC	30	Cincinnati
134	KENS	CBS	45	San Antonio
135	WISH	CBS	14	Indianapolis
136	WHNB	NBC	22	Hartford-New Haven
137	WCCB	ABC	35	Charlotte
138	WBZ	NBC	6	Boston
139	WSAZ	NBC	33	Charleston-Huntingto
140	WCHS	CBS	33	Charleston-Huntingto
141	KDFW	CBS	11	Dallas-Fort Worth
142	WKZO	CBS	41	Kalamazoo-Gr Rapids
143	WBMG	CBS	38	Birmingham
144	WBRC	ABC	38	Birmingham

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CALL LETTERS

SCHEDULE 1. BROADCAST REVENUES			
LINE NO.	CLASS OF BROADCAST REVENUES	MAKE ENTRIES IN THIS COLUMN FIRST (omit cents)	USE THIS COLUMN FOR YOUR TOTALING ONLY (omit cents)
	(a)	(b)	(c)
1	A. REVENUES FROM THE SALE OF STATION TIME:	\$	\$
2	(1) Network		
3	Sale of station time to networks:		
4	Sale of station time to major networks, ABC, CBS, MBS, NBC (before line or service charges)		
5	Sale of station time to other networks (before line or service charges)		
6	Total (lines 4 + 5)		
7	(2) Non-network (after trade and special discounts but before cash discounts to advertisers and sponsors, and before commissions to agencies, representatives and brokers):		
8	Sale of station time to national and regional advertisers or sponsors		
9	Sale of station time to local advertisers or sponsors		
10	Total (lines 8 + 9)		
11	Total sale of station time (lines 6 + 10)		
12	B. BROADCAST REVENUES OTHER THAN FROM SALE OF STATION TIME (after deduction for trade discounts but before cash discounts and before commissions):		
	(i) Revenues from separate charges made for programs, materials, facilities, and services supplied to advertisers or sponsors in connection with sale of station time:		
13	(a) to national and regional advertisers or sponsors		
14	(b) to local advertisers or sponsors		
15	(2) Other broadcast revenues		
16	Total broadcast revenues, other than from time sales (lines 13 + 14 + 15)		
17	C. TOTAL BROADCAST REVENUES (lines 11 + 16)		
18	(1) Less commissions to agencies, representatives, and brokers (but not to staff salesmen or employees) and less cash discounts		
19	D. NET BROADCAST REVENUES (lines 17 minus line 18)		*
20	Report here the total value of trade outs and barter transactions. This value must also be included as sales in the appropriate lines above . .		
21	If this is a report for a joint AM-FM operation, indicate below the amount, if any, of total broadcast revenues in line 19 which is applicable separately to the FM station:		
22	FM revenues from sale of station time (after discounts, commissions, etc.)		
23	FM revenues from providing functional music or other special services		
24	Other FM revenues		
25	Total (lines 22 + 23 + 24)		
	*Revenue figure used in financial analysis		

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CALL LETTERS.....

SCHEDULE 2. BROADCAST EXPENSES

LINE NO.	CLASS OF BROADCAST EXPENSES	MAKE ENTRIES IN THIS COLUMN FIRST (omit cents)	USE THIS COLUMN FOR YOUR TOTALING ONLY (omit cents)
	(a)	(b)	(c)
1	TECHNICAL EXPENSES:		
2	Technical payroll*	181-481	
3	All other technical expenses	149-961	
4	Total technical expenses		
5	PROGRAM EXPENSES:		
6	Payroll* for employees considered "talent"	187-641	
7	Payroll* for all other program employees	189-731	
8	Rental and amortization of film and tape	179-801	
9	Records and transcriptions	177-241	
10	Cost of outside news services	129-331	
11	Payments to talent other than reported in line (6)	129-401	
12	Music license fees	141-481	
13	Other performance and program rights	189-731	
14	All other program expenses	187-641	**
15	Total program expenses		
16	SELLING EXPENSES:		
17	Selling payroll*	199-731	
18	All other selling expenses	179-801	
19	Total selling expenses		
20	GENERAL AND ADMINISTRATIVE EXPENSES:		
21	General and administrative payroll*	177-241	
22	Depreciation and amortization	129-331	
23	All other general and administrative expenses	189-731	
24	Total general and administrative expenses		
25	TOTAL BROADCAST EXPENSES (lines 4 + 15 + 19 + 24)		

*Payroll includes, salaries, wages, bonuses and commissions.

SCHEDULE 3. BROADCAST INCOME

LINE NO.	AMOUNT (omit cents)
1	Broadcast revenues (from Schedule 1, line 19) 141-481
2	Broadcast expenses (from Schedule 2, line 25) 149-961
3	Broadcast operating income or (loss) (line 1 minus line 2)
4	Total of any amounts included in line 2 above which represent payments (salaries, commissions, management fees, rents, etc.) for services or materials supplied by the owners or stockholders, or any close relative of such persons or any affiliated company under common control (see page 3 of instructions) 187-641
5	Note: If no such payments were made, check here ☐ **Program expenses figure used in financial analysis

CHAPTER 2

EMPLOYMENT

I. INTRODUCTION

In June, 1969, the FCC issued formal rules forbidding employment discrimination by radio and television stations based upon race, color, national origin, or sex.¹ The Commission's duty to issue such rules is rooted in the national policy against discrimination in employment, as embodied in Title VII of the 1964 Civil Rights Act,² as well as the Communication Act's broad directive that all broadcast licensees serve the "public interest, convenience and necessity."

The public interest standard and the national policy take on added importance when the unique nature of broadcasting is considered. The broadcast licensee, as a "public trustee" given profitable, private use of an influential piece of public property, can only continue to be entrusted with that use if it lives up to the Commission's affirmative and enforceable public interest obligations, including obligations relating to employment.

To enable the FCC to monitor station compliance with its equal employment opportunities ruling, the broadcaster is required to submit two documents: (1) his station's equal employment opportunity plan, and (2) an employment report. The equal employment opportunity program is submitted as part of the applicant's license renewal form.³ The employment report (form 395), which records the number and position of workers by race and sex, is by far the more objective and significant of the two and must be submitted annually.⁴ It is data from this second document that is the basis for the employment rankings and statistics of our network affiliates study. (A sample of the form is included at the end of this chapter.)

The Commission has been collecting form 395 only since 1971.⁵ Nevertheless, it has become clear in that very short time that neither the Broadcast Bureau nor a majority of the Commissioners have any intention of improving the questionable employment practices this data has revealed in a large percentage of the licensees. There are two tough questions that must be answered before any gains can be made in the employment of minorities or women in broadcasting today. Neither has been treated seriously by the Commission. They are: (1) What are to be the standards for licensee compliance with the Commission rules (and the federal law) concerning equal employment opportunity? (2) What are to be the penalties for non-compliance?

The latter question should be easy enough to answer. Theoretically, the FCC penalties for non-compliance could range from temporary deferral of license renewal, pending further Commission inquiry into

¹ 47 C.F.R. § 73.680.

² 42 U.S.C. § 2000e-2 (1964).

³ § VI(b) of FCC Broadcast Renewal application form 303 calls for the applicant to outline for the Commission his proposals for conforming his policies to the FCC rules regarding equal employment opportunities.

⁴ 47 C.F.R. § 1.612.

⁵ See Report and Order in Matter of Petition for Rulemaking to Require Broadcast Licensees to Show Nondiscrimination in their Employment Practices, 23 FCC 2d 430 (1970).

the applicant's employment program or practices, to an outright denial of the application for renewal following a hearing. A penalty between deferral and denial might include subjecting the licensee to the forfeiture (fines) provisions of Section 503 of the Communications Act. All have their precedent in other areas of Commission regulation, and proper penalties could be readily determined once the standards for compliance were set.

The Commission's derogation of its responsibility to answer the first question, therefore, is a far more serious one. Prodded perhaps by the presence of the first black Commissioner in the FCC's history (Commissioner Benjamin Hooks), the Commission finally decided last August to do "something" about the equal opportunity information received with the license renewal applications.⁶ But the majority was content merely to send letters to a small handful of licensees, "requesting additional information on the licensees' efforts to provide equal employment opportunity to minority persons and women." It seemed to me we should have come up with something more than that weakly-phrased missive, and I dissented.⁷ But even that letter was only sent to stations having eleven or more employees, in areas with five per cent or greater minority population, when the form 395's reported (1) a decline in minority employees from one year to the next, or (2) no minority employees in the past year, or (3) no women employees in the past year. Note how severely restrictive those standards are. For example, a television station with sixty employees, one of whom was black, would not get a letter of inquiry—so long as it did not experience a *decline* in minority employment.

There are other serious inconsistencies in this method of dealing with the problem. A station with sixty employees whose minority employment had declined from thirty to twenty eight, for example, would, under these guidelines, receive a letter despite its fine overall showing. A station with a serious deficiency (and decline) in *female* employment would not even be considered unless the station's area had a five per cent or greater *minority* employment, thus requiring enforcement of solutions to the former problem to rely on a completely unrelated "threshold" criteria related to the latter.

Even within this restrictive (and illogical) "solution" to the equal employment problem, the Commission has failed to demonstrate any positive concern for effectively dealing with discrimination. Although the first of the letters were sent out in August, 1972, the responses from the licensees were in most cases still awaiting action by the Broadcast Bureau staff in mid-1973, and no further Commission-initiated action has been taken with regard to even the most blatant offenders.⁸ "We're just kind of waiting around with the [broadcasters'] replies [to the FCC inquiries]," was the response of one Broad-

⁶ See my dissent in *Letter to Reverend Everett C. Parker*, FCC 72-438, 24 P & F Radio Reg. 2d 396, 398 (1972), a Commission decision handed down just two months before Commissioner Hooks' arrival. See also my extensive study of employment discrimination among stations in the Pennsylvania-Delaware renewal package, which may also have had some effect on the Commission majority, *Equal Employment Opportunity Inquiry*, 36 FCC 2d 515, 517 (1972).

⁷ *Pennsylvania and Delaware Broadcasting Stations*, 38 FCC 2d 158 (1972).

⁸ Indeed, a number of the stations, after nothing but the passage of time, were simply renewed.

cast Bureau official to the query of a concerned citizen. "We don't really know what we could do about licensees who don't employ fairly anyway."⁹ This attitude is taken despite the same official's earlier admission that any of the potential courses of action outlined above (hearing, denial of renewal, fine) could be easily initiated at any moment.

Thus, the Commission leaves itself open to the charge that it is quietly searching, not for an effective course of action that would begin to reverse the traditional patterns of discrimination in the broadcasting industry, but for some course of action that would mollify critics without adversely affecting its "business-as-usual" rubber stamping of renewals.¹⁰ That this is the Commission's true attitude is further evidenced by its "reassuring" statements to the effect that the data on form 395 annual reports is "chiefly" valuable to determine *industry-wide* employment trends, and that, in regard to individual stations, it is not to be suggested "that such data for any particular year would demonstrate the existence of discrimination of any station."¹¹

In this study of the network affiliates in the top 50 markets we take issue with that contention—that a case for discrimination cannot be based upon a reading of the annual employment data of an individual station. We also dispute the *implied* contention that discrimination in employment has no important relation to the service of a licensee in the "public interest, convenience or necessity."

We have not included our employment analysis in the overall station ranking found in chapter 1. We have omitted it, however, only because that ranking was designed to evaluate programming, not because we consider employment discrimination any less important than programming. Indeed, the argument could well be made that licensee discrimination against minorities or women, especially in those jobs with a greater degree of influence on programming creation and decision-making, is as directly related to the station's programming as any of the other factors on which we have been able to gather information. Be that as it may, we have chosen to treat employment separately from programming. (1) We believe that community groups other than those oriented specifically towards quality programming will be able more effectively to consider employment if the information is presented in this manner. (2) It is our intention that this chapter complement an excellent survey of all 609 commercial TV stations already conducted and published by the Office of Communication of the United Church of Christ in 1972.¹²

⁹ Interview with an anonymous analyst in the Renewal Branch of the FCC Broadcast Bureau, March, 1973.

¹⁰ All the interested reader need do is compare the Commission's disposition of the WLBT renewal proceeding, *Lamar Life Broadcasting Co.*, 14 FCC 2d 431 (1968), with the stinging reversal of the D.C. Circuit Court of Appeals, *Office of Communications of the United Church of Christ v. FCC*, 359 F. 2d 994 (1969); the Court outlined in detail the flagrant, long-standing discrimination of the licensee, in areas of programming as well as employment.

¹¹ 23 F.C.C. 2d 430, 431 (1970).

¹² Jennings, *Television Station Employment Practices: The Status of Minorities and Women*, Office of Communication, United Church of Christ, November, 1972.

II. ANALYSIS OF MINORITY EMPLOYMENT

A. Total Employment

We have made the assumption that minority employment statistics for the top 50 markets can be compared and ranked most effectively—and fairly to the broadcasters—by taking into consideration the percentage of minorities in the population of the Standard Metropolitan Statistical Areas (SMSA) of the stations involved.¹³ For example, it would be less defensible, we felt, to compare the minority employment performance of a network affiliate in Washington, D.C. (with an SMSA minority population of 28.3%) with that of one in Minneapolis-St. Paul (with a minority population of just 3.7%) without accounting, somehow, for the differences between the minority employment pool of the two cities. Thus, we have ranked the licensees by relating their minority employment to the minority population in the SMSA. The result is a "factor" comparing two percentages. A station receiving a factor of 1.000 would be employing exactly the same *percentage* of minorities in the station as exist in the population of his area. The station ranked 26th, for example, WKYC, Cleveland, employs 17.62% minorities in an SMSA with a minority population of 17.6%, for a "factor" of 1.001. The top station in the ranking, WTEV, Providence, employs 8.33% minorities in an area with a 3.4% minority population, for a factor of 2.451. While this method of ranking does tend to favor stations in a region with a lower minority population, we would point out that a number of such stations, in markets like Salt Lake City and Minneapolis-St. Paul, nevertheless found themselves at the very bottom of our study.

It is our opinion that a licensee with a factor of less than 1.000 deserves, at a minimum, some further inquiry into its program of employment. It is rather appalling to note that some 82% of the stations in our study have total employment factors of less than 1.000, and more than 35% of them have factors of less than 0.500. Certainly the latter group deserves a more serious inquiry.

¹³ Our source for this information was the U.S. Bureau of the Census. The precise figure we required, however, included Spanish-surnamed people among "minorities" in an SMSA and was nowhere printed in an official publication. We had to go directly to the Bureau in Washington for the information.

Network Affiliates Ranked by Ratio of Percent Minorities Employed to Percent Minorities in SMSA

Rank	Call letters	Net. Aff.	Mkt. No.	Location	SMSA	Total employees	Minorities employed		Factor
							Number	Percent	
1	WTKV	ABC	34	Providence	3.4%	72	6	8.33%	2.451
2	WNXS	ABC	43	Syracuse	3.0%	77	8	10.39%	2.078
3	WPRI	CBS	34	Providence	4.8%	76	8	6.58%	1.935
4	WBZ	NBC	6	Boston	4.7%	175	23	13.14%	1.933
5	WSAZ	NBC	33	Charleston-Huntington	8.0%	81	7	8.64%	1.889
6	KING	NBC	16	Seattle-Tacoma	5.2%	136	19	13.97%	1.746
7	KGW	NBC	36	Portland	4.7%	126	11	8.73%	1.679
8	WHTN	ABC	33	Charleston-Huntington	5.0%	51	4	7.84%	1.631
9	WHEN	CBS	43	Syracuse	4.7%	75	0	0.00%	1.600
10	KDKA	CBS	33	Charleston-Huntington	4.7%	64	4	6.25%	1.576
11	WYAT	ABC	37	Albany-Schenectady	4.4%	167	14	8.38%	1.459
12	WATV	ABC	41	Oklahoma City	12.0%	103	14	13.59%	1.443
13	WTVR	NBC	43	Syracuse	12.0%	101	10	9.90%	1.413
14	WSVR	NBC	28	Columbus	12.0%	100	10	10.00%	1.386
15	WLWC	NBC	41	Kalamazoo-Gr. Rapids	6.1%	100	9	9.00%	1.365
16	WOTV	NBC	41	Oklahoma City	12.0%	77	13	16.88%	1.354
17	KOCO	ABC	28	Columbus	6.8%	90	15	16.67%	1.340
18	WTVN	ABC	37	Albany-Schenectady	4.4%	167	15	8.98%	1.323
19	WNAC	CBS	36	Portland	6.1%	76	4	5.26%	1.311
20	WTEN	ABC	41	Kalamazoo-Gr. Rapids	6.1%	71	6	8.45%	1.294
21	WZLW	ABC	39	Dayton	11.9%	144	10	6.94%	1.177
22	WZZM	ABC	9	Pittsburgh	7.5%	144	12	8.33%	1.164
23	WHIO	CBS	7	Buffalo	17.6%	103	9	8.74%	1.102
24	WHIC	NBC	25	Cleveland	5.2%	94	6	6.38%	1.088
25	WKYC	NBC	25	Cleveland	5.2%	201	7	3.48%	1.045
26	WCCO	NBC	26	Portland	3.7%	80	8	10.00%	1.001
27	KOIN	CBS	13	Minneapolis-St. Paul	9.9%	84	0	0.00%	0.981
28	WCCO	NBC	13	Minneapolis-St. Paul	11.8%	148	0	0.00%	0.941
29	WGR	NBC	30	Cincinnati	17.3%	130	23	17.69%	0.940
30	WKRC	ABC	12	St. Louis	7.8%	127	14	11.02%	0.898
31	WTOX	ABC	9	Pittsburgh	12.6%	102	14	13.73%	0.888
32	WTVS	CBS	28	Columbus	32.9%	102	3	2.94%	0.871
33	KABC	ABC	2	Los Angeles	8.8%	205	21	10.19%	0.865
34	WJAR	NBC	34	Providence	11.8%	167	11	6.59%	0.864
35	WLWT	NBC	30	Cincinnati	11.8%	167	7	4.19%	0.864
36	WLWT	NBC	30	Cincinnati	11.8%	167	7	4.19%	0.864
37	WLWD	NBC	46	Toledo	10.5%	119	8	6.72%	0.840
38	WTOL	CBS	16	Seattle-Tacoma	8.0%	190	31	16.32%	0.830
39	KIRO	CBS	24	Tampa-St. Petersburg	19.9%	124	17	13.71%	0.816
40	WJBK	CBS							
41	WFLA	NBC							

Network Affiliates Ranked by Ratio of Percent Minorities Employed to Percent Minorities in SMSA—Continued

Rank	Call letters	Net. Aff.	Mkt. No.	Location	SMSA	Total employees	Minorities employed		Factor
							Number	Percent	
42	KGO	ABC	8	San Francisco	28.9%	224	52	23.21%	0.803
43	WRC	NBC	10	Washington, D.C.	28.3%	227	61	22.47%	0.794
44	WTMJ	NBC	21	Milwaukee	28.3%	146	11	7.53%	0.769
45	WJAR	NBC	45	Phoenix	20.0%	113	17	15.04%	0.734
46	WTVL	ABC	11	Oklahoma City	12.6%	119	9	7.56%	0.722
47	WTVL	ABC	12	Indianapolis	13.4%	108	9	8.33%	0.706
48	WTVL	ABC	22	Hartford-New Haven	11.5%	144	12	8.33%	0.706
49	WTVL	ABC	14	Indianapolis	13.4%	117	12	10.25%	0.706
50	WTVL	ABC	40	Indianapolis	13.4%	117	12	10.25%	0.706
51	WMAQ	ABC	3	Chicago	23.4%	342	54	15.79%	0.675
52	WJW	CBS	7	Cleveland	17.6%	162	18	11.84%	0.675
53	KMBC	ABC	23	Kansas City	14.6%	103	10	9.71%	0.665
54	WSPD	ABC	45	Toledo	10.9%	80	6	6.98%	0.664
55	KNBC	NBC	2	Los Angeles	22.9%	229	60	21.83%	0.664
56	WISN	ABC	14	Philadelphia	19.8%	133	20	15.04%	0.660
57	WISN	ABC	14	Philadelphia	19.8%	133	20	15.04%	0.660
58	KPIX	CBS	4	San Francisco	13.4%	105	7	6.67%	0.653
59	WCAU	NBC	4	San Francisco	13.4%	105	7	6.67%	0.653
60	WFCB	NBC	40	Gwinville-Spartanburg-Ashv.	13.4%	105	7	6.67%	0.653
61	KCMO	CBS	19	Baltimore	13.4%	105	7	6.67%	0.653
62	WBAL	NBC	19	Baltimore	13.4%	105	7	6.67%	0.653
63	WLS	ABC	3	Chicago	23.4%	140	24	17.14%	0.642
64	WAVE	NBC	36	Louisville	13.4%	274	41	14.96%	0.639
65	WVNH	ABC	22	Hartford-New Haven	11.5%	110	9	8.18%	0.629
66	WTOP	CBS	10	Washington, D.C.	11.5%	81	6	7.41%	0.624
67	WOOD	CBS	45	Phoenix	20.0%	136	24	17.65%	0.624
68	WOOD	CBS	45	Phoenix	20.0%	136	24	17.65%	0.624
69	WISN	ABC	14	Philadelphia	19.8%	105	13	12.38%	0.619
70	WISN	ABC	14	Philadelphia	19.8%	105	13	12.38%	0.619
71	KFMB	CBS	20	New York City	11.5%	60	3	5.00%	0.614
72	KYW	CBS	17	Atlanta	13.4%	112	14	12.50%	0.611
73	KYW	CBS	17	Atlanta	13.4%	112	14	12.50%	0.611
74	WSPA	CBS	4	Philadelphia	19.8%	141	14	9.93%	0.601
75	KMGH	CBS	32	Denver	16.8%	202	24	11.88%	0.600
76	WCBS	CBS	1	New York City	30.0%	130	12	9.23%	0.595
77	WQXI	ABC	17	Atlanta	17.3%	280	50	17.86%	0.595
78	KQTV	NBC	12	St. Louis	17.3%	114	10	8.77%	0.594
79	KQTV	NBC	12	St. Louis	17.3%	114	10	8.77%	0.594
80	WFBM	CBS	1	Chicago	21.3%	132	16	12.12%	0.588
81	WFBM	CBS	1	Chicago	21.3%	132	16	12.12%	0.588
82	KOMO	ABC	10	Seattle-Tacoma	8.0%	134	16	11.94%	0.561
83	WFMY	CBS	48	Gresham-High Pt.-Win. Sal.	20.3%	138	7	5.07%	0.554
84	WFMY	CBS	48	Gresham-High Pt.-Win. Sal.	20.3%	138	7	5.07%	0.554

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84 WKY	ABC	36 Louisville	13.0%	56	4	7.14%	0.549
85 KCPX	ABC	50 Salt Lake City	6.9%	81	3	3.70%	0.537
86 KCPX	ABC	27 Sacramento-Stockton	22.0%	128	15	11.72%	0.533
87 WMAJ	ABC	10 Washington, D.C.	28.3%	140	21	15.00%	0.530
88 WKLP	NBC	44 Norfolk News-Hamp.	27.8%	71	10	14.08%	0.516
89 WSOJ	NBC	35 Nash-High Ft-Win Sal.	23.3%	67	7	10.45%	0.515
90 KSTP	NBC	33 Chicago	22.3%	114	13	11.36%	0.514
91 KSTP	NBC	13 Minneapolis-St. Paul	3.7%	158	3	1.85%	0.513
92 KTVK	ABC	45 Phoenix	20.0%	78	8	10.26%	0.513
93 WTI	ABC	21 Milwaukee	9.8%	120	6	5.00%	0.510
94 WWJ	NBC	5 Detroit	19.9%	149	15	10.07%	0.506
95 WFAA	ABC	11 Dallas-Fort Worth	21.3%	186	20	10.75%	0.505
96 WBAP	NBC	11 Dallas-Fort Worth	21.3%	141	15	10.64%	0.499
97 WXYZ	ABC	5 Detroit	19.9%	213	21	9.86%	0.495
98 WLAG	CBS	30 Nashville	18.7%	119	11	9.21%	0.494
99 WLAG	CBS	1 Memphis	31.0%	189	28	14.81%	0.494
100 WTVT	NBC	2 Tampa-St. Petersburg	28.6%	123	12	8.13%	0.484
101 WSB	NBC	17 Atlanta	30.6%	104	10	11.54%	0.483
102 KTRK	ABC	15 Houston	14.8%	73	5	6.85%	0.482
103 WDAF	NBC	23 Kansas City	14.8%	70	5	6.85%	0.482
104 KENS	CBS	45 San Antonio	52.6%	106	13	12.29%	0.449
105 WTAR	CBS	44 Norfolk News-Hamp.	27.3%	94	13	13.59%	0.449
106 KHOU	CBS	15 Houston	30.8%	140	11	7.86%	0.446
107 WEWS	ABC	7 Cleveland	17.8%	103	10	9.71%	0.441
108 KOVR	ABC	27 Sacramento-Stockton	22.0%	71	12	16.90%	0.440
109 WVEC	ABC	29 Memphis	38.4%	78	13	16.67%	0.434
110 WVEC	ABC	19 Baltimore	33.1%	177	14	10.88%	0.434
111 WVAR	CBS	22 Los Angeles	33.9%	217	40	15.86%	0.423
112 KBTU	ABC	32 Denver	16.8%	113	8	7.08%	0.421
113 KRON	ABC	8 San Francisco	28.9%	207	25	12.06%	0.418
114 WDSU	NBC	31 New Orleans	35.8%	136	20	14.71%	0.413
115 WTVJ	CBS	18 Miami	39.1%	155	25	16.13%	0.413
116 WTVJ	CBS	31 New Orleans	35.8%	90	13	14.44%	0.406
117 WUE	CBS	21 Milwaukee	9.8%	101	4	3.96%	0.404
118 WISN	CBS	38 Birmingham	30.0%	33	4	12.12%	0.404
119 WEMG	CBS	45 San Antonio	52.6%	80	17	21.25%	0.404
120 KSTT	NBC	22 St. Louis	17.3%	115	8	6.90%	0.402
121 KSDT	NBC	38 St. Louis	30.6%	135	18	12.00%	0.401
122 WBR	ABC	48 San Antonio	52.6%	94	19	15.67%	0.401
123 WOI	NBC	18 Miami	39.1%	131	21	15.67%	0.401
124 WCKT	NBC	27 Sacramento-Stockton	22.0%	81	7	8.64%	0.393
125 KXTV	CBS	18 Miami	39.1%	137	21	15.33%	0.392
126 WFLG	ABC	20 Cincinnati	11.8%	134	6	4.48%	0.379
127 WCP	CBS	19 Baltimore	25.1%	137	13	9.49%	0.378
128 WJZ	ABC	30 Nashville	18.7%	114	8	7.02%	0.375
129 WSM	ABC	26 Buffalo	9.9%	136	5	3.68%	0.371
130 WISN	CBS	36 Louisville	13.0%	105	5	4.76%	0.366
131 WISN	CBS	36 Louisville	13.0%	105	5	4.76%	0.366
132 KPRC	NBC	15 Houston	30.8%	125	14	11.20%	0.364

Network Affiliates Ranked by Ratio of Percent Minorities Employed to Percent Minorities in SMSA—Continued

Rank	Call letters	Net. Aff.	Mkt. No.	Location	SMSA	Total employees	Minorities employed		Factor
							Number	Percent	
132	WCCB	ABC	35	Charlotte	23.9%	24	2	8.33%	0.340
133	WBTV	NBC	35	Charlotte	23.9%	121	10	8.26%	0.346
135	WRGB	NBC	37	Albany-Schenectady-T.	4.4%	18	1	5.56%	0.291
136	WMC	NBC	29	Memphis	38.7%	82	9	10.98%	0.286
137	WXII	NBC	48	Gresham-High Pt.-Win. Sal.	10.8%	87	5	5.75%	0.283
138	KOA	NBC	32	Denver	10.8%	87	4	4.60%	0.274
139	WWL	CBS	31	New Orleans	25.6%	109	10	9.17%	0.278
140	WLCY	ABC	31	New Orleans	16.8%	70	3	4.29%	0.255
141	WVEC	ABC	44	San Francisco	27.3%	78	5	6.41%	0.236
142	WDEO	ABC	44	Newsp News-Hamp.	10.5%	41	1	2.44%	0.232
143	WFTN	NBC	33	Birmingham	30.0%	61	4	6.56%	0.219
145	KUTV	NBC	50	Salt Lake City	6.9%	87	1	1.15%	0.167
145	KSL	CBS	13	Minneapolis-St. Paul	3.7%	137	1	0.73%	0.106
146	KMSP	ABC	41	Kalamazoo-Gr. Rapids	6.1%	60	0	0.0%	0.0
147	WKZO	CBS							

B. High pay employment

With the factor developed in the previous section, it would be possible for a station to achieve a relatively high ranking and still employ most of its minorities in low paying, menial positions. Discrimination in filling the higher paying, more influential positions may be every bit as significant to the minority group member discriminated against. In Table 9, therefore, we rank the stations in our study based solely on the percentage of minorities employed in the top five job categories on the reporting form 395 (officials and managers, professionals, technicians, sales workers, and skilled craftsmen). We have not "corrected" the rankings in these categories for the total percentage of minorities in the SMSA because it is our belief that the "market" for most such employees is a national rather than local one.¹⁴

Network affiliates ranked by percent minorities employed in high pay positions

Rank	Call letters	Net. aff.	Mkt. No.	Location	High pay positions	High pay minorities employed	
						Number	Percent
1	KABC	ABC	2	Los Angeles.....	162	45	27.78%
2	KENS	CBS	45	San Antonio.....	57	12	21.05%
3	KGO	ABC	8	San Francisco.....	189	38	20.11%
4	KSAT	ABC	45	San Antonio.....	64	12	18.75%
5	KNBC	NBC	2	Los Angeles.....	174	29	16.67%
6	WREC	NBC	10	Washington D.C.....	170	27	15.88%
7	WRC	CBS	29	Memphis.....	52	8	15.38%
8	WLWC	NBC	28	Columbus.....	73	11	15.07%
9	WVUE	ABC	31	New Orleans.....	74	11	14.89%
10	WHBQ	ABC	29	Memphis.....	61	9	14.75%
11	WNBC	NBC	1	New York City.....	179	26	14.53%
12	WTOP	CBS	10	Washington D.C.....	111	16	14.41%
13	KING	NBC	16	Seattle-Tacoma.....	112	16	14.29%
14	WTVJ	CBS	18	Miami.....	127	18	14.17%
15	KPIX	CBS	8	San Francisco.....	110	15	13.64%
16	WOAI	NBC	45	San Antonio.....	60	8	13.33%
17	WMAL	ABC	10	Washington D.C.....	128	17	13.28%
18	WKYC	NBC	7	Cleveland.....	155	20	12.90%
19	WCBS	CBS	1	New York City.....	181	23	12.71%
20	WBMG	CBS	38	Birmingham.....	24	3	12.50%
21	WSB	NBC	17	Atlanta.....	104	13	12.50%
22	WSIX	ABC	30	Nashville.....	58	7	12.07%
23	WLOS	ABC	40	Gnville-Sptnbg-Ashvl.....	109	13	11.93%
24	WAGA	CBS	17	Atlanta.....	102	12	11.76%
25	WCKF	NBC	18	Miami.....	121	14	11.57%
26	WPVI	ABC	4	Philadelphia.....	236	27	11.44%
27	WMAQ	NBC	3	Chicago.....	114	13	11.40%
28	WBAL	NBC	19	Baltimore.....	62	7	11.29%
29	WYVN	ABC	28	Columbus.....	224	25	11.16%
30	WLS	ABC	3	Chicago.....	253	28	11.07%
31	KNXT	CBS	2	Los Angeles.....	82	9	10.98%
32	WJAR	CBS	44	Nor-Newp News-Hamp.....	64	7	10.94%
33	WMC	NBC	29	Memphis.....	165	18	10.91%
34	KRON	NBC	8	San Francisco.....	83	9	10.84%
35	KOOL	CBS	45	Phoenix.....	75	8	10.67%
36	KSOU	CBS	15	Houston.....	75	8	10.67%
37	KIRK	ABC	15	Houston.....	57	6	10.53%
38	WGHP	ABC	48	Gnsh-High Pt-Win Sal.....	57	6	10.53%
39	WKRC	ABC	20	Cincinnati.....	57	6	10.34%
40	WAVY	NBC	44	Nor-Newp News-Hamp.....	58	10	10.20%
41	KGTU	NBC	49	San Diego.....	59	6	10.17%
42	KOCO	ABC	41	Okahoma City.....	82	8	9.76%
43	WHTO	CBS	39	Dayton.....	83	8	9.64%
44	KOVR	ABC	27	Sacramento-Stockton.....	138	13	9.42%
45	WABC	ABC	1	New York City.....	66	6	9.09%
46	KXTV	CBS	27	Sacramento-Stockton.....	78	7	8.97%
47	WSOC	NBC	35	Charlotte.....			

¹⁴ One need only scan the pages of the various organs of the trade press, such as *Broadcasting* magazine, *TV-Radio Age*, and so forth, to see that management personnel, on-camera talent, licensed technicians and engineers and other skilled production personnel form a finite national pool which advertises for employment (and are advertised for by the broadcasters) on a nationwide basis.

Network affiliates ranked by percent minorities employed in high pay positions—
Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	High pay positions	High pay Minorities employed	
						Number	Percent
48	WCAU	CBS	4	Philadelphia.....	56	5	8.33%
49	WFBC	NBC	40	Gnville-Sptbg-Ashvi.....	45	4	8.89%
50	KPRC	NBC	15	Houston.....	102	9	8.82%
51	WQXI	ABC	17	Atlanta.....	80	7	8.75%
52	WJW	CBS	7	Cleveland.....	115	10	8.70%
53	WFLG	ABC	18	Miami.....	103	9	8.57%
54	WFLA	NBC	24	Tampa-St. Petersburg.....	82	7	8.54%
55	WVJ	NBC	3	Detroit.....	129	11	8.53%
56	WNY5	ABC	43	Syracuse.....	48	4	8.33%
57	WBTW	CBS	35	Charlotte.....	109	9	8.26%
58	WBBM	CBS	3	Chicago.....	211	17	8.06%
59	KFMB	CBS	49	San Diego.....	87	7	8.05%
60	WJBK	CBS	5	Detroit.....	138	11	7.97%
61	WWL	CBS	31	New Orleans.....	88	7	7.95%
62	WXYZ	ABC	5	Detroit.....	181	14	7.73%
63	KDFW	CBS	11	Dallas-Fort Worth.....	105	8	7.62%
64	WNAC	CBS	6	Boston.....	132	10	7.58%
65	WAST	ABC	37	Albany-Schenectady-T.....	53	4	7.55%
66	WENB	NBC	22	Hartford-New Haven.....	54	4	7.41%
67	KGW	NBC	26	Portland.....	96	7	7.29%
68	WGR	NBC	25	Buffalo.....	55	4	7.27%
69	KBTW	ABC	32	Denver.....	83	6	7.23%
70	WTV	NBC	14	Indianapolis.....	97	7	7.22%
71	WPMY	CBS	48	Gnsb-High Pt-Win Sal.....	70	5	7.14%
72	WBRC	ABC	38	Birmingham.....	56	4	7.14%
73	KTVK	ABC	45	Phoenix.....	56	4	7.14%
74	KCRA	NBC	27	Sacramento-Stockton.....	101	7	6.93%
75	WBZ	NBC	6	Boston.....	131	9	6.87%
76	KCMO	CBS	23	Kansas City.....	59	4	6.78%
77	WPRI	CBS	34	Providence.....	50	4	6.78%
78	WSAZ	NBC	33	Charleston-Huntingto.....	59	4	6.78%
79	WTIC	CBS	22	Hartford-New Haven.....	110	8	6.72%
80	WLIC	NBC	9	Pittsburgh.....	120	8	6.67%
81	WTMJ	NBC	21	Milwaukee.....	105	7	6.67%
82	KWTV	CBS	41	Oklahoma City.....	60	4	6.67%
83	WTEN	CBS	37	Albany-Schenectady-T.....	61	4	6.56%
84	KDKA	CBS	9	Pittsburgh.....	107	7	6.54%
85	KMOX	CBS	12	St. Louis.....	110	7	6.36%
86	WBAF	NBC	11	Dallas-Fort Worth.....	112	7	6.25%
87	WISH	CBS	14	Indianapolis.....	65	4	6.25%
88	WTNH	ABC	22	Hartford-New Haven.....	6	4	1.15%
89	KMBC	ABC	23	Kansas City.....	82	5	6.10%
90	WEWS	ABC	7	Cleveland.....	116	7	6.03%
91	KTVI	ABC	12	St. Louis.....	83	5	6.02%
92	WMAR	CBS	19	Baltimore.....	100	6	6.00%
93	WKBW	ABC	25	Buffalo.....	67	4	5.97%
94	WJZ	ABC	19	Baltimore.....	80	5	5.81%
95	KMGH	CBS	32	Denver.....	88	5	5.68%
96	KYW	NBC	4	Philadelphia.....	159	9	5.66%
97	WFAA	ABC	11	Dallas-Fort Worth.....	148	8	5.41%
98	WYR	NBC	43	Syracuse.....	75	4	5.33%
99	KTAB	NBC	45	Phoenix.....	75	4	5.33%
100	KIRO	CBS	16	Seattle-Tacoma.....	94	5	5.32%
101	WLWT	NBC	20	Cincinnati.....	134	7	5.22%
102	WSM	NBC	30	Nashville.....	97	5	5.15%
103	WBNS	CBS	28	Columbus.....	98	5	5.10%
104	WCCB	ABC	35	Charlotte.....	20	1	5.00%
105	WTAE	ABC	9	Pittsburgh.....	103	5	4.85%
106	WBEN	CBS	25	Buffalo.....	103	5	4.85%
107	KDA	NBC	32	Denver.....	66	3	4.55%
108	WSPD	NBC	45	Toledo.....	67	3	4.48%
109	WHEN	CBS	43	Syracuse.....	45	2	4.44%
110	WITI	ABC	21	Milwaukee.....	95	4	4.21%
111	WZZM	ABC	41	Kalamazoo-Gr Rapids.....	48	2	4.17%
112	WXII	NBC	48	Gnsb-High Pt-Win Sal.....	73	3	4.11%
113	WAVE	NBC	36	Louisville.....	70	3	3.95%
114	WLAC	CBS	30	Nashville.....	76	3	3.95%
115	WDAF	NBC	23	Kansas City.....	51	2	3.92%
116	WCPO	CBS	29	Cincinnati.....	103	4	3.88%
117	KOIN	CBS	26	Portland.....	78	3	3.85%
118	WJAR	NBC	34	Providence.....	78	3	3.85%
119	KATU	ABC	26	Portland.....	79	3	3.80%
120	KOMO	ABC	16	Seattle-Tacoma.....	132	5	3.79%
121	WHAS	CBS	36	Louisville.....	83	3	3.61%
122	WOIV	NBC	41	Kalamazoo-Gr Rapids.....	83	3	3.61%

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Network affiliates ranked by percent minorities employed in high pay positions—
Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	High pay positions	High pay minorities employed	
						Number	Percent
123	WTEV	ABC	34	Providence.....	56	2	3.57%
124	KOPX	ABC	50	Salt Lake City.....	58	2	3.45%
125	WTOL	CBS	45	Toledo.....	50	2	3.38%
126	WDSU	NBC	31	New Orleans.....	80	3	3.37%
127	WKY	NBC	41	Oklahoma City.....	90	3	3.33%
128	WTVT	CBS	24	Tampa-St. Petersburg.....	92	3	3.26%
129	WDHO	ABC	45	Toledo.....	33	1	3.03%
130	WLKY	ABC	36	Louisville.....	37	1	2.70%
131	WLWD	NBC	39	Dayton.....	78	2	2.67%
132	WAPI	NBC	38	Birmingham.....	40	1	2.50%
133	WCHS	CBS	33	Charleston-Huntington.....	44	1	2.27%
134	KSD	NBC	12	St. Louis.....	94	2	2.13%
135	WVFC	ABC	44	Nor-Newp News-Hamp.....	47	1	2.13%
136	WLCY	ABC	24	Tampa-St. Petersburg.....	52	1	1.92%
137	WCCO	CBS	13	Minneapolis-St Paul.....	162	3	1.85%
138	KSTP	NBC	13	Minneapolis-St Paul.....	119	2	1.68%
139	WLWI	ABC	14	Indianapolis.....	65	1	1.52%
140	WISN	CBS	21	Milwaukee.....	78	1	1.28%
141	KSL	CBS	50	Salt Lake City.....	101	1	0.99%
142	WSFA	CBS	40	Gnville-Sptnbg-Ashvi.....	45	0	0.0%
143	WRGB	NBC	37	Albany-Schenectady-T.....	64	0	0.0%
144	KUTV	NBC	50	Salt Lake City.....	62	0	0.0%
145	WHTN	ABC	33	Charleston-Huntington.....	36	0	0.0%
146	KMSP	ABC	13	Minneapolis-St Paul.....	48	0	0.0%
147	WKZO	CBS	41	Kalamazoo-Gr Rapids.....	51	0	0.0%

III. ANALYSIS OF FEMALE EMPLOYMENT

Women comprised approximately 22.1% of the employees at the 147 stations in our study, but only 6.4% of the employees in the five high-paying categories discussed in the previous section. That tremendous disparity points up an urgent need for affirmative action programs designed to get more women into the high-paying, decisionmaking end of broadcasting. In Table 10, therefore, we rank the network affiliates on the percentage of women employed in those five categories.

Network Affiliates Ranked by Percent Women Employed in High Pay Positions

Rank	Call letters	Net. aff.	Mkt. No.	Location	High pay positions	High pay women employed	
						Number	Percent
1	WCAU	CBS	4	Philadelphia.....	56	14	25.00%
2	WMAL	ABC	10	Washington D.C.....	128	21	16.41%
3	WTOP	CBS	10	Washington D.C.....	111	15	13.51%
4	WLKY	ABC	36	Louisville.....	37	5	13.51%
5	KMBC	ABC	23	Kansas City.....	82	11	13.41%
6	KABC	ABC	2	Los Angeles.....	162	21	12.96%
7	WGHP	ABC	48	Gnsh-High Pt-Win Sal.....	57	7	12.28%
8	WLWI	ABC	14	Indianapolis.....	65	8	12.12%
9	WSIX	ABC	30	Nashville.....	58	7	12.07%
10	KOMO	ABC	16	Seattle-Tacoma.....	132	15	11.36%
11	WAST	ABC	37	Albany-Schenectady-T.....	53	6	11.32%
12	WHTN	ABC	33	Charleston-Huntington.....	36	4	11.11%
13	WCBS	CBS	1	New York City.....	181	20	11.05%
14	WTVJ	CBS	18	Miami.....	127	14	11.02%
15	WVUE	ABC	31	New Orleans.....	74	8	10.81%
16	KTVK	ABC	45	Phoenix.....	56	6	10.71%
17	WNBC	NBC	1	New York City.....	179	19	10.61%
18	WXYZ	ABC	5	Detroit.....	181	19	10.50%
19	WPLG	ABC	18	Miami.....	105	11	10.48%
20	WTOL	CBS	45	Toledo.....	50	5	10.17%
21	WCCB	ABC	33	Charlotte.....	20	2	10.00%
22	WHIC	NBC	9	Pittsburgh.....	120	12	10.00%
23	WCXI	ABC	17	Atlanta.....	80	8	10.00%

Network Affiliates Ranked by Percent Women Employed in High Pay Positions—
Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	High pay positions	High pay women employed	
						Number	Percent
24	WBZ	NBC	6	Boston.....	131	13	9.92%
25	WLS	ABC	3	Chicago.....	224	22	9.82%
26	WXII	NBC	48	Ginsb-High Pt-Win Sal.....	73	7	9.59%
27	WLWC	NBC	28	Columbus.....	73	7	9.59%
28	WISH	CBS	14	Indianapolis.....	64	6	9.38%
29	WCCO	CBS	13	Minneapolis-St Paul.....	162	15	9.26%
30	KBMS	CBS	49	San Diego.....	87	8	9.20%
31	WOHO	ABC	45	Toledo.....	33	3	9.09%
32	Knox	CBS	12	St. Louis.....	110	10	9.09%
33	WBBM	CBS	3	Chicago.....	211	19	9.00%
34	KGO	ABC	8	San Francisco.....	180	17	8.50%
35	KING	NBC	16	Seattle-Tacoma.....	112	10	8.93%
36	WFBC	NBC	40	Gville-Sptnbg-Ashvl.....	45	4	8.89%
37	WFAA	ABC	11	Dallas-Fort Worth.....	148	13	8.78%
38	KNBC	NBC	2	Los Angeles.....	174	15	8.62%
39	WTAR	CBS	44	Nor-Newp News-Hamp.....	82	7	8.54%
40	WVEC	ABC	44	Nor-Newp News-Hamp.....	47	4	8.51%
41	WMAO	NBC	3	Chicago.....	236	20	8.47%
42	WTIC	CBS	22	Hartford-New Haven.....	119	10	8.40%
43	KMSP	ABC	13	Minneapolis-St Paul.....	48	4	8.33%
44	WRTV	NBC	14	Indianapolis.....	97	8	8.25%
45	WBNS	CBS	28	Columbus.....	98	8	8.16%
46	WTVN	ABC	28	Columbus.....	62	5	8.06%
47	WCKT	NBC	18	Miami.....	102	8	7.84%
48	KSAT	ABC	45	San Antonio.....	64	5	7.81%
49	KDFW	CBS	11	Dallas-Fort Worth.....	105	8	7.62%
50	KXTV	CBS	27	Sacramento-Stockton.....	66	5	7.58%
51	WPVI	ABC	4	Philadelphia.....	121	9	7.44%
52	WPTV	CBS	35	Charlotte.....	109	8	7.34%
53	KPIX	CBS	8	San Francisco.....	110	8	7.27%
54	WSM	NBC	30	Nashville.....	97	7	7.22%
55	WBRC	ABC	38	Birmingham.....	36	4	7.14%
56	WBAL	NBC	19	Baltimore.....	114	8	7.02%
57	WJZ	ABC	19	Baltimore.....	86	6	6.98%
58	WAVY	NBC	44	Nor-Newp News-Hamp.....	38	4	6.90%
59	WLOS	ABC	40	Gville-Sptnbg-Ashvl.....	58	4	6.90%
60	WCHS	CBS	33	Charleston-Huntingto.....	44	3	6.82%
61	KWTV	CBS	41	Oklahoma City.....	60	4	6.67%
62	KTAR	NBC	45	Phoenix.....	75	5	6.67%
63	KRON	NBC	8	San Francisco.....	165	11	6.67%
64	WHEN	CBS	43	Syracuse.....	45	3	6.67%
65	WABC	ABC	1	New York City.....	138	9	6.52%
66	WRC	NBC	10	Washington, D.C.....	170	11	6.47%
67	WKYC	NBC	7	Cleveland.....	155	10	6.45%
68	KATU	ABC	26	Portland.....	79	5	6.33%
69	WITI	ABC	21	Milwaukee.....	95	6	6.32%
70	KYW	NBC	4	Philadelphia.....	139	10	6.26%
71	KOA	NBC	32	Denver.....	66	4	6.06%
72	KNXT	CBS	2	Los Angeles.....	253	15	5.93%
73	KSTP	NBC	13	Minneapolis-St. Paul.....	119	7	5.88%
74	WSB	NBC	17	Atlanta.....	104	6	5.77%
75	WFMY	CBS	48	Ginsb-High Pt-Win Sal.....	70	4	5.71%
76	WTMJ	NBC	21	Milwaukee.....	105	6	5.71%
77	WDSU	NBC	31	New Orleans.....	80	5	5.62%
78	WHNB	NBC	22	Hartford-New Haven.....	54	3	5.56%
79	WGR	NBC	25	Buffalo.....	55	3	5.45%
80	WTEV	ABC	34	Providence.....	56	3	5.36%
81	WLWD	NBC	39	Dayton.....	75	4	5.33%
82	KHOU	CBS	15	Houston.....	75	4	5.33%
83	KSD	NBC	12	St. Louis.....	94	5	5.32%
84	KENS	CBS	45	San Antonio.....	57	3	5.26%
85	WLAC	CBS	30	Nashville.....	76	4	5.26%
86	WKRC	ABC	20	Cincinnati.....	57	3	5.26%
87	WLWT	NBC	20	Cincinnati.....	134	7	5.22%
88	KGW	NBC	26	Portland.....	96	5	5.21%
89	KOIN	CBS	26	Portland.....	78	4	5.13%
90	WISN	CBS	21	Milwaukee.....	78	4	5.13%
91	WPRI	CBS	34	Providence.....	59	3	5.08%
92	WOAI	NBC	45	San Antonio.....	60	3	5.00%
93	WTAE	ABC	9	Pittsburgh.....	103	5	4.85%
94	KUTV	NBC	50	Salt Lake City.....	62	3	4.84%
95	KBTU	ABC	32	Denver.....	83	4	4.82%
96	WMC	NBC	29	Memphis.....	64	3	4.69%
97	WRGB	NBC	37	Albany-Schenectady-T.....	64	3	4.69%
98	KMGH	CBS	32	Denver.....	88	4	4.55%
99	WWL	CBS	31	New Orleans.....	88	4	4.55%
100	WBAP	NBC	11	Dallas-Fort Worth.....	112	5	4.46%

Network Affiliates Ranked by Percent Women Employed in High Pay Positions—
Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	High pay positions	High pay women employed	
						Number	Percent
101	WSPA	CBS	40	Gville-Sptnbg-Ashvi.	45	2	4.44%
102	WNYA	ABC	43	Syracuse	48	2	4.17%
103	WBMG	CBS	38	Birmingham	24	1	4.17%
104	KOTV	NBC	49	San Diego	98	4	4.08%
105	WMAR	CBS	19	Baltimore	100	4	4.00%
106	KTRK	ABC	15	Houston	102	3	3.92%
107	KPRC	NBC	15	Houston	103	4	3.88%
108	WCPO	CBS	20	Cincinnati	129	5	3.88%
109	WWJ	NBC	5	Detroit	78	3	3.85%
110	WSOC	NBC	35	Charlotte	52	2	3.85%
111	WREC	CBS	29	Memphis	132	5	3.79%
112	WNAC	CBS	6	Boston	82	3	3.66%
113	WFLA	NBC	24	Tampa-St. Petersburg	82	3	3.66%
114	WHIO	CBS	39	Dayton	83	3	3.61%
115	KOOL	CBS	45	Phoenix	83	2	3.45%
116	KCPX	ABC	50	Salt Lake City	58	2	3.39%
117	KOCO	ABC	41	Oklahoma City	89	3	3.33%
118	WKY	NBC	41	Oklahoma City	90	2	3.28%
119	WHBQ	ABC	29	Memphis	61	2	3.28%
120	WTEN	CBS	37	Albany-Schenectady-T.	92	3	3.26%
121	WTVT	CBS	24	Tampa-St. Petersburg	94	3	3.19%
122	KIRO	CBS	16	Seattle-Tacoma	67	2	2.98%
123	WKBW	ABC	25	Buffalo	101	3	2.97%
124	KCRA	NBC	27	Sacramento-Stockton	107	3	2.80%
125	KDKA	CBS	9	Pittsburgh	109	3	2.75%
126	WAGA	CBS	17	Atlanta	115	2	2.63%
127	WAVE	NBC	36	Louisville	76	3	2.61%
128	WJW	CBS	7	Cleveland	115	1	2.50%
129	WAPI	NBC	38	Birmingham	40	2	2.41%
130	WHAS	CBS	36	Louisville	83	2	2.41%
131	KOVR	ABC	27	Sacramento-Stockton	138	3	2.17%
132	WJBK	CBS	5	Detroit	48	1	2.08%
133	WZZM	ABC	41	Kalamazoo-Gr Rapids	51	1	1.96%
134	WKZO	CBS	41	Kalamazoo-Gr Rapids	51	1	1.96%
135	WDAF	NBC	23	Kansas City	103	1	1.94%
136	WBEN	CBS	25	Buffalo	52	1	1.92%
137	WLCY	ABC	24	Tampa-St. Petersburg	116	2	1.72%
138	WEWS	ABC	7	Cleveland	59	1	1.69%
139	WSAZ	NBC	33	Charleston-Huntingto.	59	1	1.69%
140	KCMO	CBS	23	Kansas City	65	1	1.54%
141	WNH	ABC	22	Hartford-New Haven	67	1	1.49%
142	WSPD	NBC	45	Toledo	75	1	1.33%
143	WSYR	NBC	43	Syracuse	78	1	1.28%
144	WJAR	NBC	34	Providence	83	1	1.20%
145	WOTV	NBC	41	Kalamazoo-Gr Rapids	83	1	1.20%
146	KTVI	ABC	12	St. Louis	101	0	0.0%
147	KSL	CBS	50	Salt Lake City			

IV. REMEDIES FOR CLAIMS OF EMPLOYMENT DISCRIMINATION

Claims of employment discrimination against any television station may be filed with both the FCC and the Equal Employment Opportunity Commission (EEOC).

The claim can be filed with the FCC by any individual or interested community group if there is reason to believe that an employee has been discriminated against on the basis of race, color, national origin, or sex. Any claim of discrimination filed with the FCC should allege—and demonstrate, to the extent possible—that the broadcaster is in violation of his public interest responsibility to engage in fair employment practices, and that he has failed to comply with the FCC's equal employment rules.¹⁵ The FCC's action on a discrimination claim it considers legitimate will be geared toward bringing the broadcaster

¹⁵ 47 C.F.R. § 73.680.

into compliance with those rules, and a complaint before the FCC is thus brought on behalf of the Commission rather than the individual or group against whom the discrimination is alleged.

If an employee or group merely wishes to bring a claim of discrimination to the attention of the FCC, without further pursuing the matter, it may write a letter of complaint to the FCC, stating the particulars of the claim against the station. The FCC will review the complaint in much the same manner as it might review a complaint based on a violation of the fairness doctrine or another type of programming violation and may request a response from the broadcaster. At the very least, the complaint is placed in the station's complaint file for review when its license comes up for renewal. If the complaints division finds that the complaint at issue is significant enough, it will forward the complaint to the renewal branch at the appropriate time.¹⁶

A fuller remedy at the FCC might be pursued in the form of a petition to deny the station's license renewal.¹⁷ The petition may assert discrimination against particular employees or it may cite a general trend or pattern of employment discrimination, both of which are a violation of the FCC's equal employment rules. The petition to deny provides a remedy separate from the Commission's independent inquiry into a complaint about the station's equal employment practices. It requires the Commission to confront the issue directly, and is therefore somewhat more likely to result in further inquiry by the Commission, a fine under Section 503 of the Communications Act,¹⁸ or the outright denial of renewal of the broadcaster's license; at the very least, the issues involved will be given a fuller airing than they might receive if the complaint merely takes the form of a letter of information to the FCC.

Unlike a claim of employment discrimination filed at the FCC, a charge of discrimination filed with the EEOC is aimed at providing relief to the individual employee who feels he has been discriminated against. The following is but an abbreviated description of the process to be followed at the EEOC. More information can be acquired by writing or calling:

U.S. Equal Employment Opportunity Commission
1800 G Street, N.W.
Washington, D.C. 20506

or

District or Regional Offices of the EEOC
(listed in local telephone directories under U.S. Government)

Title VII of the 1964 Civil Rights Act, which created the EEOC forbids discrimination in hiring, upgrading and all other conditions of employment, where the discrimination is based upon race, color, religion, sex or national origin.¹⁹ Title VII, as amended, covers all employers with 15 or more employees, so all the television stations in this

¹⁶ Unfortunately, time and the renewal process have proven that what citizens would consider significant and what the FCC would consider significant are often leagues apart in areas like employment.

¹⁷ See the procedures described in greater detail in Chapter 4 of this Report.

¹⁸ 47 U.S.C. § 503(b)(1) provides for a forfeiture of up to \$1000 per violation, up to a limit of \$10,000, against any licensee who "willfully or repeatedly fails to observe any of the provisions of this Act or any rule or regulation of the Commission. . . ."

¹⁹ 42 U.S.C. § 2000 e-2 (1964).

survey (and all other television stations as well) should be required to comply with its provisions.

A person who believes that he or she is a victim of discrimination by a broadcast employer may file a complaint with the EEOC at the above address. A complaint may also be filed by an individual or a group *on behalf of* any individual who may have suffered discrimination.

An individual who feels he or she cannot file a charge because of a need to remain anonymous may write one of the EEOC's five Commissioners in Washington, D.C., requesting the filing of a Commissioner's Charge, and setting forth the facts which warrant the filing of such a charge. The individual Commissioner may, at his or her discretion, proceed to file a charge, permitting the complaint to remain anonymous.

It is important that an individual file the charge as soon as possible after the discrimination takes place. In most cases the charge must be filed within 180 days of the discrimination complained of if the EEOC is to have jurisdiction of the matter.

When the EEOC receives the charge, a representative reviews the facts and contacts the complainant. If the charge is one which can be handled by the EEOC, an investigator gathers all the facts from the complainant and from the parties charged with discrimination. The EEOC is required by law to furnish a copy of the charge to the parties charged with discrimination.

If the EEOC does not find that the facts support the complainant's charge, the complainant and the parties charged with discrimination are notified that the charge has been dismissed.

If the EEOC finds reasonable cause to believe that the individual has been discriminated against, it then attempts to conciliate and reach an agreement satisfactory to all parties involved. Before the passage of the Equal Employment Opportunity Act of 1972, the EEOC was limited to this process of conciliation in seeking a resolution of the charge. Now, if the EEOC cannot reach a settlement agreeable to all parties, the Commission may go to a United States District Court to obtain an order prohibiting the discrimination.²⁰

The person filing the complaint is also entitled to request notification of his or her own right to file a suit if the EEOC cannot reach a settlement or if the EEOC does not take the case to court within 180 days after the complaint is filed.

In some instances, however, the EEOC may not act directly on the charge until state remedies are sought. If the individual bringing the charge lives in a state or locality which enforces its own fair employment practices law, the EEOC must initially send the case to the state or local agency for investigation and notify the individual that it has done so. After a minimum of 60 days have passed, the EEOC automatically reactivates the charge, unless it has already been settled to the satisfaction of the individual bringing the charge by the state or local agency.

Finally, an individual charging discrimination should remember that it is illegal for anyone to penalize or retaliate against the individual in any way. In the event any attempt is made to penalize or retaliate against a person in any way for filing a charge with the EEOC, the EEOC should be notified immediately.

²⁰ — U.S.C. — (1972 Supp.).

For further information about this avenue of relief, you should acquire, in addition to the United Church of Christ materials described in Chapter 4, the EEOC pamphlets *Facts about Title VII of the Civil Rights Act of 1964* and *Toward Job Equality for Women*, from the EEOC's Washington office.

V. NATIONAL EMPLOYMENT ANALYSIS

A. Total Employment

The 147 television stations included in this study, the major network affiliates in the nation's top 50 television markets, reported 17,641 full-time employees in 1971 and 17,737 in 1972, an increase of 96, or 0.5%. Employment of minority group employees among full-time employees at the 147 stations was 1,759 (10.0%) in 1971 and 2,043 (11.5%) in 1972. Women were employed in 3,893 of the full-time positions (22.1%) in 1971 and 3,926 (22.1%) in 1972.

TABLE 11.—Total Full-time Employment—147 Stations—1972

Total employees.....	17,641 (100%)	17,737 (100%)	+96 (+0.5%)
Minority employees.....	1,759 (10.0%)	2,043 (11.5%)	+284 (+16.1%)
Women employees.....	3,893 (22.1%)	3,926 (22.1%)	+33 (22.1%)

Of the 147 stations, the following 19 reported fewer than five minority employees:

TABLE 12.—Fewer Than Five Minority Employees—1972

Call letters	Channel #	Location	Market #	Number of minority employees
KSTP	5	Minneapolis/St. Paul.....	13	3
KMSP	9	Minneapolis/St. Paul.....	13	0
WISN	12	Milwaukee.....	21	4
WLCY	10	Tampa/St. Petersburg.....	24	3
KOA	4	Denver.....	32	4
WHTN	13	Charleston/Huntington.....	33	4
WCHS	8	Charleston/Huntington.....	33	4
WJAR	10	Providence.....	34	3
WCCB	18	Charlotte.....	35	2
WLKY	32	Louisville.....	36	4
WAST	13	Albany/Schenectady/Troy.....	37	4
WTEN	10	Albany/Schenectady/Troy.....	37	4
WRGB	6	Albany/Schenectady/Troy.....	37	1
WAPI	13	Birmingham.....	38	4
WKZO	3	Grand Rapids/Kalamazoo.....	41	0
WDHO	24	Toledo.....	45	1
KCPX	4	Salt Lake City.....	50	3
KUTV	2	Salt Lake City.....	50	1
KSL	3	Salt Lake City.....	50	1

B. High Pay Positions

Of the nine job positions in the annual employment report, five have substantially higher pay scales than the rest. They are: officials and managers, professionals, technicians, sales workers, and craftsmen. In 1972, the 147 stations reported 13,448 full-time workers in the upper five job categories. This represents about 75.8% of all the full-time employees at the 147 stations.

Minority employees comprised 9.2% (1,241 jobs) of the stations' full-time positions in the upper five job categories in 1972 (compared with 11.5% of the total station work force), and women held 866 jobs, comprising 6.4% (compared with 22.1% of the total station work force). In short, comparing the differential between high pay and total jobs, women are *more* discriminated against by broadcasters within their organizations than minorities.

TABLE 13.—Total Minorities and Women in High Pay Positions—1972

	1972 number	Percentage
Total full-time.....	13,448	100%
Minorities full-time.....	1,241	9.2%
Women full-time.....	866	6.4%

Of the 147 stations, the following 16 (10.9%) reported employing one or no minorities in the upper five job categories in 1972:

TABLE 14a.—Stations Employing 0 or 1 Minorities in High Pay Positions—1972

Call ltrs.	Location	Ch. #	Mkt. #	Total high-pay employees	Minority high-pay employees
WKZO	Grand Rapids/Kalamazoo.....	3	41	51	0
KMSP	Minneapolis/St. Paul.....	9	13	48	0
KSL	Salt Lake City.....	5	50	101	1
KUTV	Salt Lake City.....	2	50	62	0
WRGB	Albany/Schenectady/Troy.....	6	37	64	0
WDHO	Toledo.....	24	45	33	1
WISN	Milwaukee.....	12	21	78	1
WLCY	Tampa/St. Petersburg.....	10	24	52	1
WVEC	Norfolk/Newport News.....	13	44	47	1
WAPI	Birmingham.....	13	38	52	1
WLKY	Louisville.....	32	36	37	1
WCHS	Charleston/Huntington.....	8	33	44	1
WHTN	Charleston/Huntington.....	13	33	36	0
WSPA	Greenville/Spartanburg/Asheville.....	7	40	45	0
WCCB	Charlotte.....	18	25	20	1
WLWI	Indianapolis.....	13	14	66	1

Of the 147 stations, the following 17 (11.6%) reported employing one or no women in the upper five job categories in 1972:

TABLE 14-b.—Stations Employing 0 or 1 Women in High Pay Positions—1972

Call ltrs.	Location	Ch. #	Mkt. #	Total high-pay employees	Minority high-pay employees
KSL	Salt Lake City.....	5	50	101	0
WOTV	Grand Rapids/Kalamazoo.....	8	41	83	1
KTVI	St. Louis.....	2	12	83	1
WTAR	Providence.....	10	34	78	1
WSPD	Toledo.....	13	45	67	1
WTNH	Hartford/New Haven.....	8	22	65	1
KCMO	Kansas City.....	5	23	59	1
WSAZ	Charleston/Huntington.....	3	33	59	1
WLCY	Tampa/St. Petersburg.....	10	24	52	1
WKZO	Grand Rapids/Kalamazoo.....	3	41	51	1
WDAF	Kansas City.....	4	23	51	1
WSYR	Syracuse.....	3	43	75	1
WZZM	Grand Rapids/Kalamazoo.....	13	41	48	1
KUTV	Salt Lake City.....	2	50	62	1
WREC	Memphis.....	3	29	52	1
WAPI	Birmingham.....	13	38	40	1
WBMG	Birmingham.....	42	38	124	1

It should be especially noted that there are double offenders among the ranks of these, the most egregious of high-pay discriminators. Stations KSL, Salt Lake City, KUTV, Salt Lake City, WLCY, Tampa-St. Petersburg, WKZO, Grand Rapids-Kalamazoo and WAPI, Birmingham report a combined total of some 306 high-pay positions, but employ a total of just three minorities and four women in those positions.

C. Increase or decrease of minority and female employment from 1971 to 1972

100 stations (68%) reported an increase in the number of full-time minority group employees in 1972 over 1971; 47 (32%) reported a decrease or remained the same. 67 stations (46%) reported an increase in the number of full-time women employees in 1972 over 1971; 80 (54%) reported a decrease or remained the same. Once again, by this measure, we see that more efforts are being made to improve the employment picture for minorities than for women.

The following 64 stations reported *decreases* in employment of minorities, or women, or both:

TABLE 15.—Stations Showing Decrease in Employment of Minorities or Women—1972²¹

Call ltrs.	Location	Ch.#	Mkt.#	M=minorities W=women
WCBS	New York City.....	2	1	W
KNXT	Los Angeles.....	2	2	W
WPVI	Philadelphia.....	6	4	W
WCAU	Philadelphia.....	10	4	W
WJBK	Detroit.....	2	5	M, W
WWJ	Detroit.....	4	5	W
WNAC	Boston.....	7	6	M, W
WJW	Cleveland.....	8	7	W
WRC	Washington, D.C.....	4	10	W
WMAL	Washington, D.C.....	7	10	W
WBAP	Dallas/Ft. Worth.....	5	11	W
KMOX	St. Louis.....	4	12	W
KTVI	St. Louis.....	2	12	W
WCCO	Minneapolis/St. Paul.....	4	13	M
KSTP	Minneapolis/St. Paul.....	5	13	M, W
KMSP	Minneapolis/St. Paul.....	9	13	M
WRTV	Indianapolis.....	6	14	M, W
KTRK	Houston.....	13	15	W
KOMO	Seattle/Tacoma.....	4	16	W
KIRO	Seattle/Tacoma.....	7	16	W
WAGA	Atlanta.....	5	17	M, W
WKRC	Cincinnati.....	12	20	M, W
WCPO	Cincinnati.....	9	20	W
WTMJ	Milwaukee.....	4	21	M, W
WITI	Milwaukee.....	6	21	W
WTNH	Hartford/New Haven.....	8	22	M, W
WHNB	Hartford/New Haven.....	30	22	W
WDAF	Kansas City.....	4	23	W
KMBC	Kansas City.....	9	23	M
KCMO	Kansas City.....	5	23	W
WLCY	Tampa/St. Petersburg.....	10	24	W
WFLA	Tampa/St. Petersburg.....	8	24	W
WGR	Buffalo.....	2	25	W
KOIN	Portland.....	6	26	W
WBNS	Columbus.....	10	28	M, W
WTVN	Columbus.....	6	28	W
WLWC	Columbus.....	4	28	W
WEM	Nashville.....	4	30	M
WWL	New Orleans.....	4	31	W
KOA	Denver.....	4	32	M
KMBH	Denver.....	7	32	M
KBTB	Denver.....	9	32	M, W
WPRI	Providence.....	12	34	W

TABLE 15.—Stations Showing Decrease in Employment of Minorities—Continued

Call ltrs.	Location	Ch. #	Mkt. #	M = minorities W = women
KSL	Salt Lake City.....		5	50 M, W
WCCB	Charlotte.....	18		35 M
WHAS	Louisville.....	11		36 M, W
WLKY	Louisville.....	32		36 W
WAVE	Louisville.....	3		36 W
WAPI	Birmingham.....	13		38 M
WHIO	Dayton.....	7		39 W
WLOS	Greenville/Spartanburg/Asheville.....	13		40 W
KOCO	Oklahoma City.....	5		41 W
WKY	Oklahoma City.....	4		41 W
WZZM	Grand Rapids/Kalamazoo.....	13		41 M, W
WOTV	Grand Rapids/Kalamazoo.....	8		41 M, W
WVEC	Norfolk/Newport News.....	13		44 M
KOOL	Phoenix.....	10		45 W
KTVK	Phoenix.....	3		45 M
WOAI	San Antonio.....	4		45 M
WTOL	Toledo.....	11		45 W
WDHO	Toledo.....	24		45 M, W
WSPD	Toledo.....	13		45 W
WFMY	Greensboro/Winston Salem/High Point.....	2		48 W
KUTV	Salt Lake City.....	2		50 M, W

^a It should be noted, however, that certain of these stations are *relatively speaking* among the very best in our employment rankings. WCAU, for example, ranks Number 1 in employment of women in high pay positions, even though it experienced a decline.

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SECTION IV - FULL-TIME PAID EMPLOYEES (applicable to all respondents)

JOB CATEGORIES ¹	ALL EMPLOYEES ²			MINORITY GROUP EMPLOYEES							
	Total (Col. 2+3)	Male	Female	MALE				FEMALE			
				Negro	Oriental	American Indian ³	Spanish Surnamed American	Negro	Oriental	American Indian	Spanish Surnamed American
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Officials and managers											
Professionals											
Technicians											
Sales workers											
Office and clerical											
Craftsmen (Skilled)											
Operatives (Semi-skilled)											
Laborers (Unskilled)											
Service workers											
TOTAL											
Total employment from previous report (if any)											

¹Refer to Instructions for explanation of all title functions.²Include "Minority Group Employees" and others. See instruction 6.³In Alaska, include Eskimos and Aleuts with "American Indian."

SECTION V - PART-TIME PAID EMPLOYEES (applicable to all respondents)

JOB CATEGORIES ¹	ALL EMPLOYEES ²			MINORITY GROUP EMPLOYEES							
	Total (Col. 2+3)	Male	Female	MALE				FEMALE			
				Negro	Oriental	American Indian ³	Spanish Surnamed American	Negro	Oriental	American Indian	Spanish Surnamed American
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Officials and managers											
Professionals											
Technicians											
Sales Workers											
Office and clerical											
Craftsmen (Skilled)											
Operatives (Semi-skilled)											
Laborers (Unskilled)											
Service workers											
TOTAL											
Total employment from previous report (if any)											

¹Refer to Instructions for explanation of all title functions.²Include "Minority Group Employees" and others. See instruction 6.³In Alaska, include Eskimos and Aleuts with "American Indian."

Chapter 3

PATTERNS OF OWNERSHIP

The question of who should (or should not) own the facilities and control the programming of radio and television stations has been at the very heart of broadcasting since the decision was first made to regulate the use of the public airwaves by licensing them for private profit.¹

¹ See Johnson and Hoak, "Media Concentration: Some Observations on the United States' Experience," 56 Iowa L. Rev. 267 (1970).

For, while the allocation of frequencies to local rather than national broadcast service committed an almost wastefully-large chunk of the spectrum to broadcasting, there have always been fewer desirable frequencies available than parties requesting the opportunity to exploit them. No less true today is Justice Frankfurter's 1943 dictum that broadcasting must be subject to governmental regulation because "unlike other modes of expression, radio inherently is not available to all. . . . Because it cannot be used by all, some who wish to use it must be denied. . . ." ²

The concentration of broadcast outlets in the hands of a few wealthy individuals or corporations would seem to be inimical to the manner of regulation contemplated in the Communications Act of 1934. Not only would those few use up the opportunities of many others (and particularly minority groups who have been almost completely shut out of station ownership), they would provide the basis for an extremely unhealthy situation in which the "voices" utilizing the spectrum would be expressive of far fewer viewpoints than Congress originally intended.

The Commission has always waxed schizophrenic in the promulgation and enforcement of rules and policies designed to alleviate the problems of media control. Diversification of ownership has always been recognized as a valid means to the goal of diversity of "voices," of viewpoints available to the public,³ but there has also existed considerable confusion regarding the achievement of that goal. The Commission continues to acknowledge that a proper objective should be ". . . the maximum diversity of ownership that technology will allow in each area . . .,"⁴ but its words have become irrevocably clouded by its actions.

In 1971, for example, the Commission decided that ownership interest by anyone in more than seven AM, seven FM or seven television stations (of which no more than five may be VHF) would be contrary to the public interest (the so-called "7-7-7 rule").⁵ In late 1972, however, the Commission allowed Cosmos Broadcasting of Louisiana to purchase television station WDSU-TV in New Orleans. The purchase gave the assignee's parent, Cosmos Broadcasting Corporation, the license to its fourth VHF station, three of which are in the same geographic region of the country, but it also gave the South Carolina National Bank of Charleston an interest in its *ninth* VHF station, and a Mr. John Smith an interest in his *eighth*.⁶

Another aspect of media ownership regulation has been the intolerably fragmented promulgation and enforcement (or non-enforcement) of rules and policies regarding different types of ownership problems. The 7-7-7 rule, for example, took no cognizance of cross-

² *National Broadcasting Company v. United States*, 319 U.S. 190 at 226 (1943).

³ See *Multiple Ownership of AM, FM, Television Broadcast Stations*, 18 FCC 288, 291 (1953). Although there is no provision in the Federal Communications Act of 1934 dealing specifically with the concentration of ownership, the power to promulgate rules as the multiple ownership rules has been found to lie within the administrative discretion of the FCC under the broad purposes of the Act. See *United States v. Storer Broadcasting Co.*, 351 U.S. 192 (1956).

⁴ *In the Matter of Amendment of §§ 73.35, 73.240, and 73.636 of the Commission Rules Relating to Multiple Ownership of Standard, FM and Television Broadcast Stations*, 18 P & F Radio Reg. 2d 1735 (1970). One presumes "technology" would allow each individual station in any given region to be licensed to a different person or corporate entity.

⁵ 47 C.F.R. § 73.636(a)(2).

⁶ WDSU-TV, Inc., 39 FCC 2d 534 (1972).

ownership among the various broadcast media, thus theoretically permitting each broadcaster to acquire AM-FM-TV combinations in single markets, so long as it did not exceed its "limit" of seven of each. In March of 1970, in an attempt to remedy this omission, the "one-to-a-market" amendment to the multiple ownership rules was adopted.⁷ It provided, prospectively only, that the FCC would not approve applications for construction permits or transfers of licenses if more than one full-time broadcasting outlet would be owned or controlled by the same owner in the same market.

The one-to-a-market rule created such an outcry among broadcasters, however, that by March of 1971 the Commission had amended it and made it applicable only to combinations of VHF television stations with aural stations in the same market.⁸ AM and FM stations in the same market could be commonly owned, and combinations of UHF and aural stations were to be handled on a case-by-case basis. The Commission also noted that the problem of cross-ownership of *newspapers* and television or radio facilities was perhaps more important, but that Commission regulation in this area would be far less effective because the Commission does not regulate newspapers.

The Commission has long been charged with the language of the Supreme Court holding that "Congress intended to leave competition in the business of broadcasting,"⁹ and that the Commission "should administer its regulatory powers with respect to broadcasting in the light of the purposes which the . . . [antitrust laws were] designed to achieve."¹⁰ Other recognizably antitrust aspects of the media ownership problem, such as regional concentration or local monopolization of all media, *including newspapers*, could therefore well be reached under this broad mandate. However, the Commission continues essentially to ignore that mandate and to grant new or assigned broadcast facilities to established media interests, as in Los Angeles, where the transfer of an AM-FM combination to an applicant with an interest in the L.A. Times was approved,¹¹ or in Georgetown, Texas, where an FM license was awarded to an applicant who owned the city's only newspaper, its only AM radio station and its only cable television franchise,¹² or in other cases right down to the present.¹³ Only when monopoly abuses can be documented does the Commission take any positive action, as in Mansfield, Ohio, where it denied the application of the Mansfield Journal Company for licenses to construct an AM/FM combination because it found that the Company had used its position as the sole newspaper in the community to exert pressures on advertisers.¹⁴

Other equally complex facets of the ownership question have arisen in the course of Commission deliberations, but the majority of Commissioners has rarely been inclined to resolve the unique problems attendant each of them. One example might be found in the potential

⁷ Amendment of Multiple Ownership Rules, *supra* note 4.

⁸ Amendment of Multiple Ownership Rules, 21 P & F Radio Reg. 2d 1551 (1971).

⁹ *F.C.C. v. Sanders Bros. Radio Station*, 309 U.S. 470, 475 (1940).

¹⁰ *National Broadcasting Co., supra* note 2, 319 U.S. 190, 223 (1943).

¹¹ *John Poole Broadcasting Co., Inc. and KRIQ, Inc.*, FCC 69-118 (1969).

¹² *Charles R. Fanoie, Jr.*, FCC 71-203 (1971).

¹³ See, e.g., my dissent in *McPherson Broadcasting, Inc.*, FCC 98757 (1973).

¹⁴ *Mansfield Journal Co. v. FCC*, 18 F2d 28 (D.C. Cir. 1950). More recently, see *Greater Boston TV Corp. v. FCC, WHDH, Inc. v. FCC, et al.*, 444 F2d 891 (D.C. Cir. 1970), in which the Court upheld the award of a newspaper company's Boston VHF television to a competing applicant.

adverse affects of allowing one owner to build a *regional* concentration. This can often occur with far fewer than the "allowable" seven AM, seven FM or seven television stations. Yet it has been difficult (if not impossible) for the Commission to visualize the harm to the local population. There are always, it seems, "sufficient outside media influences" in the air—even if they originate in a large city some 75 miles away—to rationalize a majority conclusion to diminish further the diversity of media voices in a given region. This was the case, for example, earlier this year when the majority granted a new FM facility to an applicant in Muskegon Heights, Michigan, who already owned four AM and two FM stations within the same general Grand Rapids-Kalamazoo metropolitan area.¹⁵

Another distressing line of ownership precedent concerns the tendency of the Commission majority to grant to an owner new stations or major improvements in facilities, either of which essentially "decides" that the owner is qualified to be a broadcast licensee, at a time when those very same qualifications are being called into question in the course of other proceedings before the Commission. Late in 1972, for example, the Commission granted an application for the assignment of WXY-FM, Fort Lauderdale, Florida to RKO General, Inc., even though RKO's most basic qualifications were being challenged in hearings concerned with the renewal of its VHF television licenses in Los Angeles and Boston.¹⁶

In undertaking to study nearly 150 television stations in our 50 largest media markets, we had hoped to be able to compare the performance of the "media barons"—the corporate owners possessed of conglomerate interests both within and without the various media—with that of the independent, local owners who would have no such outside interests. That comparison has proved to be impossible, because it is apparent from a brief glance at our ownership tables that virtually none but a small handful of those network affiliates would qualify as even remotely resembling "local" owners. On the information available, just three of the 147 stations in our ownership "sample" were owned by independent owners—i.e., owners with no reported outside interests (including, but by no means limited to broadcasting or other media).¹⁷ And while those three were ranked numbers 54, 56 and 97 in our composite programming rankings (certainly an average enough showing) they hardly constitute a sufficiently large group for adequate comparison with the multiple or multimedia owners.

Multiple owners, on the other hand, seemed to have something of a stranglehold on the television audiences of the top 50 markets. Just 17 large corporations account for the ownership of 68 of the stations in our study, each of them owning three or more affiliates, and the 17 also account for some 137 other reported broadcasting interests. Thirteen other owners each held two of the affiliates in our top 50 study, and that group accounted for some 70 *additional* broadcast holdings among them. In other words, just 30 corporate owners hold the licenses of 94

¹⁵ *Muskegon Heights Broadcasting Co., Inc.*, 30 F.C.C. 2d 475 (1973).

¹⁶ *RKO General*, FCC 72-1201 (1972).

¹⁷ Of course, it is impossible to tell which of even these independents have unreported outside corporate interests, or which of their stockholders or officers might have similar unreported interests. We have been necessarily limited in our study to data available at the F.C.C., and as noted in the text at footnote 22, that data is very often incomplete.

of the top 50 market network affiliates and also appear to own, among themselves, nearly 4% of *all* the broadcasting stations in the country¹⁸—with, of course, access to decidedly more than 4% of the nation's audience.

Multimedia owners, with major interests in media other than broadcasting, appear also in epidemic proportion among the licensees of the network affiliates in our top 50 markets. No fewer than 80 American newspapers¹⁹ are co-owned with network affiliates in our study, including at least 38 of our largest urban dailies. A partial listing should give you some feel for the extent of the incestuous cross-ownership between the nation's most profitable television stations and its most powerful newspapers:

Albuquerque Tribune	Fort Worth Star-Telegram
Baltimore News-American	Houston Post
Baltimore Sun	Los Angeles Herald-Examiner
Boston Record-American	Los Angeles Times
Chattanooga Times	Milwaukee Journal
Cincinnati Post and Times-Star	Minneapolis Star and Tribune
Cleveland Press	New York Times
Columbus Dispatch	Newsday
Daily Oklahoman	Oklahoma City Times
Dallas Times-Herald	Pittsburgh Press
Dallas Morning News	San Francisco Chronicle
Dayton News	San Francisco Examiner
Denver Post	St. Louis Post-Dispatch
Detroit News	Washington Evening Star
Fort Worth Press	Washington Post

In addition, it is worth noting some of the numerous other publishing interests represented among the network affiliates in this report:

Fairchild Publications	Random House
Pontiac Press	World Almanac
Holt, Rinehart and Winston	Time
Phoenix Magazine	Fortune
Cosmopolitan	Sports Illustrated
Vogue	Time-Life Books
Good Housekeeping	Mademoiselle
Better Homes and Gardens	Glamour
House and Garden	Harpers Bazaar
Sports Afield	Newsweek
Avon Books	McGraw Hill
Popular Mechanics	Corinthian
United Technical Publications	Science Digest
Successful Farming	Money

¹⁸ What's more, even those figures do not come close to telling the full story, since among that 4% are probably well over half of the most highly profitable radio and television properties in the country.

¹⁹ The precise number is difficult to determine, since some licensees list merely the corporate owner for a group of smaller newspapers in their form 323.

To these publishing interests must be added the myriad cable television systems and franchises still held by these licensees.²⁰

How, then, are we to analyze the information we have gathered from Commission records? In the first place, we would do well to note that the information accumulated by the Commission, largely from the form 323 ownership reports,²¹ is by no means complete (or even absolutely accurate). For example, nowhere in the FCC files can we locate any information about the type or extent of defense subsidiaries known to be owned by licensees like Avco or Westinghouse or General Electric. Often, multi-billion dollar conglomerate holdings are merely summarized, for purposes of the form 323, with innocuous phrases like "additional manufacturing interests" or "various product subsidiaries." Moreover, the major stockholders and/or officers of those corporations—the persons who can actually be found to be exercising the most significant control over the policies of the stations—are rarely identified satisfactorily by the anonymous corporate licensees, and the outside interests of those individuals are rarely enumerated for the FCC's information. A *thorough* report on patterns of ownership, which would study conglomerates and subsidiaries, ties through directorships or individual shareholders or financial institutions, and so forth, would quite simply require as many man-hours of well-structured research as were spent on this entire report, even if we were to limit ourselves to the top 50 markets. It once took the FCC *18 months* to prepare a simple report of its ownership information for a Senate Committee—and even then the Committee was able to point out errors.

We should use this section, then, primarily to underscore the current state of media ownership in America today, and secondarily to make note of the relative performance in areas of programming and employment of our "media baron" licensees. It can be seen, for example, that some of the conglomerate owners have done markedly better than others. There can be no question but that the Westinghouse Corporation, whose five stations rank a truly remarkable 1, 2, 4, 5 and 31 in overall programming, cares more about its audience (among the conglomerate owners) than, say, Taft Broadcasting, whose five stations rank 49, 120, 123, 134 and 136, or ABC, whose five were ranked 13, 76, 102, 115 and 117.

Other results were not nearly so clear-cut, however, with curious spreads for owners like Hearst (8, 48, 132) or Cox Broadcasting Corp. (15, 31, 57, 126) or Combined Communications (23, 91, 142) scattering their stations all over the programming charts. Given greater manpower and more time, the programming ownership data would perhaps have been analyzed further; until that opportunity occurs, we have attempted to gather as much information as possible in the ownership tables that follow, and leave it to others to assimilate that information.

²⁰ These are too numerous, and often too ill-defined, to set out here. There are hundreds of cable systems and franchises cross-owned with the broadcasting properties in this Report; however, Commission Rules specifically prohibit cross-ownership of cable and broadcast facilities in the same market, and require divestiture of all facilities so held of one type or the other by August 10, 1973. 47 C.F.R. § 76.501.

²¹ Required by 47 C.F.R. § 1.615.

The Tables below are designed to provide a maximum amount of information about each of the owners represented in the study. Table 16 simply lists the stations alphabetically by their call letters and provides a cross reference to the name of the owner as it will be listed in Table 17. Table 17 contains 17 separate columns, with entries for the owner (listed alphabetically), the stations falling within our top 50 market study, the market number, location, channel number, and network affiliation of each station, its composite programming rank, its rank in each of the major programming areas, and its rank in employment of minorities and women. The remaining columns list the owners' additional interests, to the extent available at the Commission, in other broadcasting stations, newspapers or publishing media, and other unrelated corporate interests. An asterisk (*) next to a listing in one of these three columns indicates a *controlling* (though not necessarily 100%) interest in the company, if under some other corporate or individual's name. A double asterisk (**) indicates less than a controlling interest in the company.

TABLE 16.—Cross Reference of Owners to Call Letters

(Alphabetically by call letter)

Call ltrs	Location	Owner
KABC	Los Angeles.....	American Broadcasting Companies, Inc.
KATU	Portland.....	Fisher Companies, Inc.
KBTU	Denver.....	Combined Communications Corp.
KCMO	Kansas City.....	Meredith Corporation.
KCPX	Salt Lake City.....	Columbia Pictures Industries, Inc.
KCRA	Sacramento/Stockton.....	Kelly Broadcasting Co. (Partnership)
KDFW	Dallas/Fort Worth.....	Times Mirror Co.
KDKA	Pittsburgh.....	Westinghouse Electric Corp.
KENS	San Antonio.....	Harte-Hanks Newspapers, Inc.
KFMB	San Diego.....	Midwest Television Inc.
KGO	San Francisco.....	American Broadcasting Companies, Inc.
KGTV	San Diego.....	McGraw-Hill Inc.
KGW	Portland.....	King Broadcasting Co.
KHOU	Houston.....	Dun & Bradstreet, Inc.
KING	Seattle/Tacoma.....	King Broadcasting Co.
KIRO	Seattle/Tacoma.....	Bonneville International Inc.
KMBC	Kansas City.....	Metromedia, Inc.
KMGH	Denver.....	McGraw-Hill Inc.
KMOX	St. Louis.....	Columbia Broadcasting System Inc.
KMSP	Minneapolis/St. Paul.....	Twentieth Century-Fox Film Corp.
KNBC	Los Angeles.....	RCA Corporation
KNXT	Los Angeles.....	Columbia Broadcasting System Inc.
KOA	Denver.....	General Electric Company
KOCO	Oklahoma City.....	Combined Communications Corp.
KOIN	Portland.....	Newhouse Broadcasting Co. (50%) (Orig Own 50%)
KOMO	Seattle/Tacoma.....	Fisher Companies Inc.
KOOL	Phoenix.....	G. Autry (55%), T. Chaussey (20%) Kerney (12%), F. Beer (5%); listed under KOOL Radio- Television, Inc., licensee
KOVR	Sacramento/Stockton.....	Metropolitan Broadcasting Corp.
KPIX	San Francisco.....	Westinghouse Electric Corp.
KPRC	Houston.....	Houston Post
KRON	San Francisco.....	Chronicle Publishing Co.
KSAT	San Antonio.....	The Outlet Company
KSD	St. Louis.....	Pulitzer Publishing Co.
KSL	Salt Lake City.....	Bonneville International Corp.
KSTP	Minneapolis/St. Paul.....	Hubbard Broadcasting Inc.
KTAR	Phoenix.....	KTAR Broadcasting Co.
KTRK	Houston.....	Capital Cities Broadcasting Corp.
KTVI	St. Louis.....	Newhouse Broadcasting Corp.
KTVK	Phoenix.....	E. McFarland (41%) (various small %'s); listed under Arizona Television, Inc. licensee
KUTV	Salt Lake City.....	Standard Corp. (80%) CIC (20%)
KWTV	Oklahoma City.....	Griffin Television Inc.
KWV	Sacramento/Stockton.....	Dun & Bradstreet, Inc.
WABC	Philadelphia.....	Westinghouse Electric Corp.
WAGA	New York City.....	American Broadcasting Companies, Inc.
	Atlanta.....	Storer Broadcasting Co.

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TABLE 16.—Cross Reference of Owners to Call Letters—Continued
[Alphabetically by call letter]

Call ltr	Location	Owner
WAPI	Birmingham	Newhouse Broadcasting Corp.
WAST	Albany/Schenectady/Troy	Sonderling Broadcasting Corp.
WAVE	Louisville	Orion Broadcasting, Inc.
WAYY	Norfolk/Newport News	Lin Broadcasting Corp.
WBAL	Baltimore	Hearst Corp.
WBAP	Dallas/Fort Worth	Carter Publications, Inc.
WBBM	Chicago	Columbia Broadcasting System Inc.
WBEN	Buffalo	Buffalo Evening News
WBMG	Birmingham	Southern Broadcasting (33%) (various small %'s)
WBNS	Columbus	Dispatch Printing Co.
WBRC	Birmingham	Taft Broadcasting Co.
WBTB	Charlotte	Jefferson Pilot Corp.
WBZ	Boston	Westinghouse Electric Corp.
WCAU	Philadelphia	Columbia Broadcasting System, Inc.
WCBS	New York City	Columbia Broadcasting System, Inc.
WCCB	Charlotte	Mecklenburg Television Broadcasters Inc.
WCCO	Minneapolis/St. Paul	Mid-Continent TV (53%), Mpls Star (47%)
WCHS	Charleston/Huntington	Rollins, Inc.
WCKT	Miami	Sunbeam Television Corp.
WCPO	Cincinnati	Scripps-Howard Broadcasting Co.
WDAF	Kansas City	Taft Broadcasting Co.
WDHO	Toledo	Overmeyer Co. Inc.
WDSU	New Orleans	Cosmos Broadcasting Corp.
WEWS	Cleveland	Scripps-Howard Broadcasting Co.
WFAP	Dallas/Fort Worth	Dallas Evening News
WFBC	Greenville/Spartanburg/Asheville	Multimedia, Inc.
WFLA	Tampa/St. Petersburg	Media General Inc.
WFMY	Greensboro/Winston Salem/High Point	Landmark Communications Inc.
WGHP	Greensboro/Winston Salem/High Point	Southern Broadcasting Co., Inc.
WGR	Buffalo	Taft Broadcasting Co.
WHAS	Louisville	WHAS, Inc.
WHBQ	Memphis	RKO General Inc.
WHEN	Syracuse	Meredith Corp.
WHIO	Dayton	Cox Broadcasting Corp.
WHNB	Hartford/New Haven	Plains Television Corp.
WHTN	Charleston/Huntington	Reeves Broadcasting Corp.
WHIC	Pittsburgh	Cox Broadcasting Corp.
WISN	Indianapolis	Corinthian Broadcasting Corp.
WISN	Milwaukee	Hearst Corp.
WITI	Milwaukee	Storer Broadcasting Co.
WJAR	Providence	The Outlet Company
WJBK	Detroit	Storer Broadcasting Co.
WJW	Cleveland	Storer Broadcasting Co.
WJZ	Baltimore	Westinghouse Electric Corp.
WKBW	Buffalo	Capital Cities Broadcasting Corp.
WKEF	Dayton	Springfield Television Broadcasting Corp.
WKY	Oklahoma City	WKY Television System, Inc.
WKRC	Cincinnati	Taft Broadcasting Co.
WKYC	Cleveland	RCA Corporation
WKZO	Grand Rapids/Kalamazoo	Fetzer Communications, Inc.
WLAC	Nashville	Life & Casualty Ins. Co. (50%); T. Baker, Jr. (28%), A. Beaman (22%)
WLCT	Tampa/St. Petersburg	Rahall Communications Corp.
WLKY	Louisville	Sonderling Broadcasting Co.
WLOS	Greenville/Spartanburg/Asheville	Wometco Enterprises, Inc.
WLS	Chicago	American Broadcasting Companies
WLWC	Columbus	Avco Corp.
WLWD	Dayton	Avco Corp.
WLWI	Indianapolis	Avco Corp.
WLWT	Cincinnati	Avco Corp.
WMAL	Washington, D.C.	Evening Star Newspaper Co.
WMAQ	Chicago	RCA Corporation
WMAR	Baltimore	A. S. Abel Co.
WMC	Memphis	Scripps-Howard Broadcasting Co.
WNAC	Boston	RKO General Inc.
WNBC	New York City	RCA Corporation
WNYB	Syracuse	The Outlet Corp.
WOAI	San Antonio	Avco Corp.
WOTV	Grand Rapids/Kalamazoo	Time, Inc.
WPLG	Miami	Post Newsweek Stations, Inc.
WPRI	Providence	Poole Broadcasting Co.
WPVI	Philadelphia	Capital Cities Broadcasting Corp.
WQXI	Atlanta	Pacific & Southern Broadcasting Co., Inc.
WRC	Washington, D.C.	RCA Corporation
WREC	Memphis	New York Times Co.

TABLE 16.—Cross Reference of Owners to Call Letters—Continued

[Alphabetically by call letter]

Call ltrs	Location	Owner
WRGB	Albany/Schenectady/Troy	General Electric Co.
WRTV	Indianapolis	McGraw-Hill, Inc.
WSAZ	Charleston/Huntington	Lee Enterprises, Inc.
WSB	Atlanta	Cox Broadcasting Corp.
WSIX	Nashville	General Electric Company
WSM	Nashville	NLT Corp.
WSOC	Charlotte	Cox Broadcasting Corp.
WSPA	Greenville/Spartanburg/Asheville	Spartan Radiocasting Co.
WSPD	Toledo	Storer Broadcasting Co.
WSYR	Syracuse	Newhouse Broadcasting Corp.
WTAE	Pittsburgh	Hearst Corp.
WTAR	Norfolk/Newport News	Landmark Communications Inc.
WTEN	Albany/Schenectady/Troy	Pooler Broadcasting Co.
WTEV	Providence	WGAL-TV
WTIC	Hartford/New Haven	Travelers Corp.
WTMJ	Milwaukee	The Journal Co.
WTNH	Hartford/New Haven	Capital Cities Broadcasting Corp.
WTOL	Toledo	Cosmos Broadcasting Corp.
WTOP	Washington, D.C.	Post-Newsweek Stations, Inc.
WTVJ	Miami	Wometco Enterprises, Inc.
WTVN	Columbus	Taft Broadcasting Co.
WTVT	Tampa/St. Petersburg	WKY Television System Inc.
WVEC	Norfolk/Newport News	Peninsula Broadcasting Corp.
WVUE	New Orleans	Columbia Pictures Industries Inc.
WWJ	Detroit	The Evening News Association
WWL	New Orleans	Loyola University
WXII	Greensboro/Winston Salem/High Point	Multimedia, Inc.
WXYZ	Detroit	American Broadcasting Companies, Inc.
WZZM	Kalamazoo/Grand Rapids	Syncom

TABLE 17.—Ownership Information

Owner	Station(s)	Chan- nel	Affili- ation	Market	Mkt. No.	Rank	Local	News	Comm.	Fin.	Min.	Wom- en	Interest or ownership		
													PSA	Other broadcasting	Publishing
A. S. Abell Co.	WMAR-TV	2	CBS	Baltimore...	19	34	11	25	78	104	110	105	41	WMAR-FM (Bal- timore)	Baltimore Sun
American Broadcasting Co., Inc.	KABC-TV	7	ABC	Los Angeles	2	102	123	115	86	17	34	6	43	WBOC-TV (Salis- bury, Md.)	
	KGO-TV	7	ABC	San Francisco	8	76	94	70	99	30	42	34	106	WBOC-TV "	
	WABC-TV	7	ABC	New York...	1	13	63	77	53	1	98	65	62	WABC-TV (N.Y.)	
	WLS-TV	7	ABC	Chicago...	3	115	53	61	143	66	63	25	87	WFL-TV (N.Y.)	ABC Films, Inc.
	WXYZ-TV	7	ABC	Detroit...	5	117	89	116	135	28	97	18	141	WLS-TV (Chicago)	ABC Int. Television, Inc.
Arizona Tele- vision Co. (licensing controlling interest by E. McFar- land).	KTVK-TV	3	ABC	Phoenix...	45	97	86	122	49	75	94	10	111	WDAI-TV (Chi- cago)	ABC Records, Inc.
														KGO-TV (S.F.)	ABC Record Sales, Inc.
														KABC-TV (S.F.)	ABC Pictures Corp.
														KLOS-TV (L.A.)	ABC Theatre Holdings, Inc.
														WXYZ-TV (De- troit)	ABC Sports, Inc.
														WRIF-TV (De- troit)	
														KQV-TV (Pitts- burgh)	
														WDVE-TV (Pitts- burgh)	
														KXVZ-TV (Hous- ton)	
														KAUW-TV (Hous- ton)	

TABLE 17.—Ownership Information—Continued

Owner	Station(s)	Chan- nel	Affil- iation	Market	Mkt. No.	Rank	Local News	Comm.	Fin.	Min.	Wom- en	PSA	Other broadcasting	Interest or ownership	Publishing	Other
Arco Corp.....	WLWC-TV..	4	NBC	Columbus,	28	131	99	67	121	118	15	27	91	WWDC-AM (Wash., D.C.)		Arco Embassy Pictures.
	WLWD-TV	2	NBC	Dallas.....	30	83	30	42	127	53	34	81	79	WWDC-FM "		Carte Blanche
	WLWI-TV	13	ABC	Indianapolis	14	65	64	35	130	37	47	8	90	KYA-AM-FM "		Arco Radio Television Sales, Inc.
	WLWT-TV	5	NBC	Cincinnati -	20	25	1	118	129	44	36	87	36	KOIT-FM "		Arco Pro-
	WOAI-TV	4	NBC	San Antonio	45	58	58	58	31	93	123	92	38	WOAI-AM (San Antonio)		gram Sales,
														WETH-AM (St. Louis)		Arco Film & various manufacturers' interests
Bonville Int. Corp.	KIRO-TV	7	CBS	Seattle/ Tacoma	16	114	66	53	100	125	30	122	110	KSL-AM (Salt Lake)	Salt Lake City Desert News	The Church of Jesus Christ of Latter Day Saints Brigham Young University CATV
	KSL-TV	5	CBS	Salt Lake City	50	33	57	90	88	6	145	167	118	KSL-FM " KIRO-AM (Seattle)	"	Wash., Utah; Logan, Idaho; Salt Lake City, U.S.
														KIRO-FM " WNEW-AM (N.Y.) WFRM-FM KMBZ-AM (K.C.) KMBR-FM (K.C.) KBIG-AM (L.A.) KNTZ-FM KBYU-FM (Provo, Utah) KBYU-TV WCLF-FM (Chicago, Ill.)		
														WBEN-AM (Buffalo)	Buffalo Evening News	
														WBEN-FM "		
Buffalo Evening News Inc.	WBEN-TV	4	CBS	Buffalo.....	25	38	55	21	60	80	130	136	35	WBEN-AM (Buffalo)	Buffalo Evening News	

Capital Cities Broadcasting Corp.	KTRK-TV WKSW-TV WPVI-TV	13 ABC 7 ABC 6 ABC	Houston..... Buffalo..... Philadelphia.....	15 28 4	64 73 50	98 106 62	18 78 14	124 106 113	69 100 45	100 100 56	102 123 81	101 WKBW-AM 31 KFBP-TV 10 KFRB-TV	Ft. Worth Publications Houston Pontiac Press Co.
	WTNH-TV	8 ABC	Hartford/ New Haven	22	96	81	81	57	124	65	141	28 WTVF-TV WFAT-AM (Durham, N.C.)	
												WFAT-AM (Paterson, N.J.) KFOL-AM (L.A.) WRO-AM (L.A.) WPRO-AM (Providence)	
Carver Publications, Inc.	WBAP-TV	5 NBC	Dallas/Ft. Worth	11	93	132	50	36	115	96	100	30 WBAP-AM (Ft. Worth) WBAP-FM KPRC-AM (Houston)	Ft. Worth <i>Sar-Tide-gram</i> Houston Post
Houston Post/ Channel 2 TV Co.	KPRC-TV	2 NBC	Houston....	16	41	29	22	79	94	132	107	12 KPRC-AM (Houston)	
Chronicle Pub. Co.	KRON-TV	4 NBC	San Francisco	8	-----	-----	-----	-----	-----	114	63	KRON-FM (San Francisco)	San Francisco Chronicle

TABLE 17.—Ownership Information—Continued

Owner	Station(s)	Chan- nel	Abil- ity	Market	Mkt. No.	Rank	Local News Comm.	Fin. Min.	Wom- en	PSA	Other broadcasting	Publishing	Other	
Columbia Broadcasting System, Inc.	KMOX-TV KNXT-TV KNBT-TV WCATV-TV	4 CBS 2 CBS 2 CBS 10 CBS	St. Louis Los Angeles Chicago Philadelphia	12 2 3 4	27 40 74 46	89 21 33 42	11 8 18 127	106 128 141 73	31 112 81 69	32 72 83 1	49 WCBG-AM (New York) 85 WCBG-FM " 82 WCBG-TV " 38 WCATV-AM "	Holt, Rinehart, and Winston	CBS Int'l CBS Musical Interests Cinema Center Tulsa CBS Laboratory Creative Playthings W.B. Saunders CBS Schools, Inc. Viacom Int'l CATV (Fairfax, Va.) Heraldtribune Co., San Francisco Valley, Ca.; Sausalito, Ca.; Sonoma, Ca.; Bellevue, Wa.; Los Angeles, Calif.; Seattle, Wash.; Telemedia, Inc. CATV (Tr systems); Times Mirror Co. CATV Systems (22 sys-tems); Nor-Cal Cable-Cablevision, Inc.** CATV (2 s-stations)	
CBS	WCBS-TV	2 CBS	New York	1	26	75	4	111	27	75	13	22 WCATV-AM (Chicago) WBWM-AM (Chicago) WBWM-FM (Chicago) KMOX-AM (St. Louis) KMOX-FM " KCBS-AM (San Francisco) KCBS-FM " WEEL-AM (Boston) WEEI-FM " WEEI-AM (Los Angeles) KNX-AM (Los Angeles) KNXP-FM (Hollywood)		

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Columbia Pictures Industries Inc. (Screen Gens Broad-casting)	KCPX-TV	4 ABC	Salt Lake City	50	109	142	136	16	40	85	116	29	KCPX-AM (Salt Lake City)	Screen Gens Productions
	WVUE-TV	8 ABC	New Orleans	31	79	107	112	44	34	117	15	72	KCPX-FM (Newark)	Screen Gens-Columbia Music Inc.
													WAPA-TV (San Juan)	Robert Music
													**WOLE-TV (Aguadilla-Mayaguez, P. R.)	Hill Records Learning Corp. of America
Combined Communications Inc.	KBTU-TV	9 ABC	Denver	32	142	91	128	142	42	113	95	123	KTAR-AM (Phoenix)	Pictures
	KOCO-TV	5 ABC	Oklahoma City	41	91	62	124	81	53	17	117	33	KTAR-FM	Eller Outdoor Advertising
	KTAR-TV	12 NBC	Phoenix	45	23	8	64	68	48	45	62	88	KBLU-AM (Yuma)	
Cosmos Broad-casting Corp.	WD, U-TV	6 NBC	New Orleans	31	36	20	55	82	55	115	77	136	KBLU-TV	
	WTOL-TV	11 CBS	Toledo	45	98	87	71	65	122	38	20	103	WSFA-TV (Montgomery)	
Cox Broad-casting Corp.	WHIO-TV	7 CBS	Dayton	29	126	45	123	133	87	23	114	143	WSB-AM (Atlanta)	Bing Crosby Productions
	WHIC-TV	11 NBC	Pittsburgh	9	15	17	53	101	8	24	22	66	WSB-FM	Cable
	WSB-TV	2 NBC	Atlanta	17	31	5	56	54	116	101	74	78	WHIO-AM (Dayton)	Communications
	WSOC-TV	9 NBC	Charlotte	35	57	122	75	18	47	90	110	109	WHIO-FM	CATV (29)
													WHIO-AM (Miami)	systems owned and 3 others partly-owned
													WALA-FM	CATV (2)
													KTVU-TV	Cleveland
													WSOC-AM (Charlotte)	systems
													WSOC-FM	Video Service Company
Dallas Evening News	WFAA-TV	8 ABC	Dallas/Ft. Worth	11	85	47	114	75	85	95	37	67	WFAA-AM (Dallas)	News-Texan Dallas
													WFAA-FM	Morning News
													WDFM-TV (Beaumont, Tx.)	6 suburban dailies

TABLE 17.—Ownership Information—Continued

Owner	Station(s)	Chan- nel affili- ation	Market	Mkt. No.	Rank Local News Comm.				Fin. Min.	Wom- en	PSA	Interest or ownership		Other	
					No.	22	22	19				85	01		33
Dispatch Print- ing Co.	WBNS	10 CBS	Columbus...	28	22	22	19	85	01	33	45	14	WBNS-AM (Columbus). WBNS-FM	*Columbus Dispatch. " *Dispatch Printing Co. " Corinthian Editors, Inc.	Corinthian Broadcast- ing Corp. owned by Dun & Bradstreet.
Dun & Brad- street.	KHOV-TV KXTV-TV	11 CBS 10 CBS	Houston.... Sarra- to/ Stockton Indianap- olis.	15 27	70 105	25 101	30 122	110 66	127 66	105 125	82 50	60 74	KOTV-TV (Tulsa). WANE-TV (Fl. World).	Corinthian Broadcast- ing Corp. owned by Dun & Bradstreet.	
	WISH-TV	13 ABC		14	104	73	65	80	135	67	28	67			
Evening News Assn.	WWJ-TV	4 NBC	Detroit.....	5	69	9	31	131	112	94	109	83	WWJ-AM (Detroit). WWJ-FM KOLO-TV (Tucson) WALA-TV (Mobile)	Detroit News.	
Evening Star Broadcasting Co.	WMAL-TV	7 ABC	Wash., D.C.	10	7	4	6	30	57	87	2	17	WMAL-AM (Wash., D.C.). WMAL-FM WLVA-TV (Lynchburg, Va.) WLVA-AM WCIV-TV (Charleston, S.C.)	Evening Star Wash., D.C.	
Petzer Com- munications Inc.	WKZO-TV	3 CBS	Grand Rapids/ Kalamazoo	41	138	108	100	91	142	147	134	129	WKZO-AM (Grand Rapids, Mich.) *KMEG-TV (Sioux City) *WKZO-AM (Kalamazoo) *WJEF-AM (Grand Rapids) *WJEF-FM *WWTY-TV (Cullman) *WVTV-AM *WVTV-FM	Wolverine Cablevision CATV (Albion, Mich., Battle Creek, Mich.)	

[illegible]

TABLE 17.—Ownership Information—Continued.

Owner	Station(s)	Chan- nel	Affil- ation	Market	Mkt. No.	Bank	Local	News	Comm.	Fin.	Min.	Wom- en	PSA	Interest or ownership		Other
														Other broadcasting	Publishing	
Hearst Co. p.	WBAL-TV	11	NBC	Baltimore...	19	48	19	33	95	101	61	56	21	WBAL-AM (Balti- more)	Baltimore News- American	Baltimore News- American Herald- Examiner San Francisco Examiner Boston Record- American San Antonio Light Seattle Post- Intelligencer Good House- keeping Chenopodan Harpers Sports Afield Popular Mechanics Science Digest Avon books
	WISN-TV	12	CBS	Milwaukee...	21	122	97	98	123	82	118	90	58	WBAL-FM " "	Los Angeles	
	WTAE-TV	4	ABC	Pittsburgh...	9	8	52	60	10	16	33	93	16	WISN-AM (Mil- waukee)	Herald- Examiner	
														WTAE-AM (Pitts- burgh)	San Francisco Examiner	
Hubbard Broadcasting Co. Inc.	KSTP-TV	5	NBC	Minneapo- lis/St. Paul	13	50	43	91	62	71	91	73	126	WTAE-FM " "	Boston Record- American	San Antonio Light Seattle Post- Intelligencer Good House- keeping Chenopodan Harpers Sports Afield Popular Mechanics Science Digest Avon books
														WAPA-AM (San Juan)	Boston Record- American	
														KOB-TV (Albu- querque)	San Antonio Light	
														KSTP-AM-FM (Minn. St. Paul)	San Antonio Light	
Jefferson Pilot Corp.	WBT-TV	3	CBS	Charlotte...	35	82	46	52	93	120	134	52	63	WTOG-TV (St. Petersburg)	Jefferson Productions	Jefferson Productions
														KSTP-AM-FM (Minn. St. Paul)	Jefferson Productions	
														WGTG-TV (Cy- press Gardens, Fl.)	Jefferson Productions	
														WBT-AM (Char- lotte)	Jefferson Productions	
														WBT-FM " "	Jefferson Productions	Jefferson Productions
														WBT-TV (Rich- mond)	Jefferson Productions	
														WBTG-AM (Greensboro)	Jefferson Productions	Jefferson Productions

Journal Co.....	WTMJ-TV	4	NBC	Milwaukee..	21	74	13	92	107	89	44	76	135	WTMJ-AM (Milwaukee)	WTMJ-FM	*Milwaukee Journal	Midwestern Relay Company (closed circuit) CATV
Kelly Broadcasting Co.	KORA-TV	8	NBC	Sacramento	27	20	27	14	73	69	86	124	77	KORA-AM (Sacramento)			Point, WI.; Wausau, WI.; Whitling, WI.)
King Broadcasting Co.	KOW-TV KING-TV	8 8	NBC NBO	Portland Seattle Tacoma	26 16	10 3	67 76	35 48	53 6	2 3	7 6	88 35	32 133	KING-AM (Seattle) KING-TV KREM-TV KREM-AM KREM-FM KRW-AM KRW-FM			King Video-cable Co. CATV (Lodi, Ca.; Los Angeles, Ca.; Placerville, Ca.; Lake Co., Calif.; Portland, Ore.; Ellensburg, Wa.; Monticello, Wa.; Westport, Wa.; Kelso, Wa.; Seattle, Wa.; Bothell, Wa.)
KOOL Radio-Television Inc. (licensee) (controlling interest by Gene Autry).	KOOL-TV	10	CBS	Phoenix.....	45	140	93	78	140	119	67	115	11	KOOL-FM (Phoenix)			**V. by Videon Inc. CATV (3 systems and 2 franchises)

TABLE 17.—Ownership Information—Continued

Owner	Station(s)	Chan- nel	Affili- ation	Market	Mkt. No.	Rank	Local News Comm.	Fin.	Min.	Wom- en	PSA	Interest or ownership				
												Other broadcasting	Publishing	Other		
Landmark Communica- tions Inc.	WFMY-TV	2	CBS	Greensboro/ High Point/ Winston- Salem.	48	9	96	38	2	76	83	75	91	(Not legible) WTAR-AM (Norfolk). WTAR-FM (Norfolk).	Norfolk Virginian- Pilot Ledger Star Greensboro Daily News.	Teleable Corp. (CATV (Auburn, Ga.; Co- lumbus, Ga.; De- catur, Al.; Opelika, Al.; Selma, Al.; Bloom- ington, Il.; Kokomo, Ind.; Roa- oke, N.C.; Rajida, N.C.; Wytheville, Va.; Beck- ley, W.Va.; Princeton, W.Va.; Racine, Wl. and 7 franchises)
	WTAR-TV	3	CBS	Norfolk/ Newport News/ Hampton.	44	-----	-----	-----	-----	105	30	-----	-----	-----	-----	-----
Lee Enterprises Inc.	WSAZ-TV	3	NBC	Charleston/ Hunting- ton	33	124	119	58	71	139	5	139	91	KGLO-AM (Mason City, Ia.) KGLO-TV KEYC-TV (Mankato, Mn.) KFVC-FM KHQA-TV (Hannibal, Mo.) WTAD-AM (Quincy, Il.) WTAD-FM WDR-FM (Quincy, Il.) KFAR-FM (Quincy, Il.) WLAC-FM (Nash- ville)	Various daily newspapers in Iowa, Illinois, Wisconsin, Nebraska, Montana, and Oregon	-----
	WLAC-TV	5	CBS	Nashville...	30	89	39	101	114	49	98	85	138	-----	-----	American General Life In- surance Co. (half-owner)

Lin Broadcast- ing Corp.	WAVY-TV	10	NBC	Norfolk/ Newport News/ Hampton	44	81	121	54	37	84	88	53	20	WAND-AM (De- catur, Ga.) WAVY-TV KAAY-AM (Little Rock) KAAY-FM KEEL-AM (Shreveport) KEEL-FM WAKY-AM (Louisville) WBBF-AM (Rochester) WBBF-TV WIL-AM (St. Louis) WIL-FM KILT-AM (Houston) KILT-FM WWL-AM (New Orleans) WWL-FM KERO-TV (Bakersfield) WKAB-TV (Montgomery) WABG-AM (Green- wood, Ms.) WABG-TV WOLO-TV (Colum- bia, S.C.) WBBJ-TV (Jackson, Ind.) WBLJ-AM (Bowling Green, Ky.) WBLJ-FM WWOD-AM (Lynchburg, Va.) KXEL-AM (Water- loo, Ia.) KXEL-FM WDOD-AM WDOD-FM WKN-AM (Kingsport, Ind.)	-----
Loyola University	WWL-TV	4	CBS	New Orleans	31	11	7	24	72	31	139	99	95	WWL-AM (New Orleans) KILT-FM WWL-AM (New Orleans) KILT-FM KERO-TV (Bakersfield) WKAB-TV (Montgomery) WABG-AM (Green- wood, Ms.) WABG-TV WOLO-TV (Colum- bia, S.C.) WBBJ-TV (Jackson, Ind.) WBLJ-AM (Bowling Green, Ky.) WBLJ-FM WWOD-AM (Lynchburg, Va.) KXEL-AM (Water- loo, Ia.) KXEL-FM WDOD-AM WDOD-FM WKN-AM (Kingsport, Ind.)	-----
McGraw-Hill Inc.	KGTV-TV KMGB-TV WRTV-TV *WCCB-TV	10 7 6 18	NBC CBS NBC ABC	San Diego... Denver... Indianapolis Charlotte...	49 32 14 35	112 99 37 144	111 44 63 133	102 73 89 129	89 118 90 84	62 96 64 137	79 75 89 133	104 98 84 21	121 83 84 112	McGraw-Hill	
Mecklenburg Television Broadcasters Inc.															

TABLE 17.—Ownership Information—Continued

Owner	Station(s)	Chan- nel	Mkt. No.	Rank	Local	News	Comm.	Fin.	Min.	Wom- en	Interest or ownership		Other
											Other broadcasting	Publishing	
Media General, Inc.	WFLA-TV	8 NBC	24	127	120	51	134	78	41	113	54	WFLA-AM (Tampa)	GATV (Fredericksburg, Va.)
Meredith Corp.	KCMO-TV	5 CBS	23	87	54	69	102	97	61	140	109	WFLA-FM " "	Better Homes and Gardens
	WHEN-TV	5 CBS	43	108	127	89	90	54	9	64	115	WHEN-AM (Syracuse)	Successful Farming
												WPHO-AM (Phoenix)	Appleton-Century Crofts
												WPHO-TV	New Century Lyons & Carnahan
												KCMO-AM (Kansas City)	
Metromedia												KFMU-FM	
												WOW-AM (Omaha)	
												WOW-FM	
												WOW-TV " "	
												WNEU-TV (Flint)	
												WNEU (New York)	
												WNEW-FM " "	
												WNEW-TV " "	
												KLAC-AM (Los Angeles)	
												KMET-FM " "	
												KTTV-TV " "	
												WXLX-TV (New York)	
												WABT-FM (Washington, D.C.)	
												WTTG-TV " "	
												WIP-AM (Philadelphia)	
												WMNR-FM " "	
												WHK-AM (Cleveland)	
												WOMC-FM (Detroit)	
													Metromedia Producers Corp.
													Wolper Pictures Ltd.
													Wolper Productions, Inc.
													For Capades Inc.

Metropolitan Broadcasting Corp.	KOVR-TV	13	ABC	Sacramento/ Stockton	27	44	134	120	20	5	108	131	97	WMMS-FM (Cheve- land)	Fresno Bee, Inc. Cablevision Inc. (Oroville, Ca.; Yuba City, Ca.; and 4 others) CATV (Rice Lake, WI.)
														WTGN-TV (Minneapolis)	
														KSAN-FM	
														WCBM-FM (Baltimore)	
														KNBW-AM (Oak- land)	
														KMJ-AM (Fresno)	
														KMJ-TV	
														KBEE-AM (Modesto)	
														KBEE-FM	
														KBFK-AM (Sacramento)	
Midcontinent Television	*WCCO-TV	4	CBS	Minneapo- lis/St. Paul	13	84	12	74	130	72	28	29	116	KBFK-FM WCCO-AM (Minneapolis)	Minneapolis Star and Tribune Co. Lindsay- Schaub News- papers Champaign News Gazette
														WFO-AM (Minneapolis)	
														KFMB-AM (San Diego)	
														KFMB-FM	
														WMBD-AM	
														WMBD-FM (Peoria)	
														WMBD-TV	
														WGIA-TV	
														WGIA-TV (Green Bay)	
														WFBC-AM (Greenville)	
Midwest Tele- vision Inc.	KFMB-TV	8	CBS	San Diego...	49	96	51	20	132	128	71	30	37	WFBC-FM (Greenville)	Greenville News Piedmont Ashville Citizen Times Montgomery Advertiser Alabama Journal
														WMAZ-AM (Macon)	
														WMAZ-FM	
														WMAZ-TV	
														WHIE-AM (Knoxville)	
														WHIE-FM	
														WHIE-TV	
														WVNC-AM (Asheville)	
Multimedia Inc.	WFBC-TV	4	NBC	Greenville/ Spartan- burg/ Ashville	40	72	104	63	14	130	60	36	85	WFBC-AM (Greenville)	**CATV (Columbus, In.)
														WMAZ-AM (Macon)	
														WMAZ-FM	
														WMAZ-TV	
														WHIE-AM (Knoxville)	
														WHIE-FM	
														WHIE-TV	
														WVNC-AM (Asheville)	
Multimedia Inc.	WFBC-TV	4	NBC	Greenville/ Spartan- burg/ Ashville	40	72	104	63	14	130	60	36	85	WFBC-AM (Greenville)	**CATV (Columbus, In.)
														WMAZ-AM (Macon)	
														WMAZ-FM	
														WMAZ-TV	
														WHIE-AM (Knoxville)	
														WHIE-FM	
														WHIE-TV	
														WVNC-AM (Asheville)	
Multimedia Inc.	WFBC-TV	4	NBC	Greenville/ Spartan- burg/ Ashville	40	72	104	63	14	130	60	36	85	WFBC-AM (Greenville)	**CATV (Columbus, In.)
														WMAZ-AM (Macon)	
														WMAZ-FM	
														WMAZ-TV	
														WHIE-AM (Knoxville)	
														WHIE-FM	
														WHIE-TV	
														WVNC-AM (Asheville)	

TABLE 17.—*Ownership Information—Continued*

Owner	Station(s)	Chan- nel	Affil- ation	Market	Mkt. No.	Rank	Local	News Comm.	Fm.	Min.	Wom- en	PSA	Other broadcasting	Ownership or other
Newhouse Broadcasting Corp.	KOIN-TV	6	CBS	Portland...	26	21	84	29	59	12	27	89	5 WSYR-AM	••Denver
	KTUV-TV	2	ABC	St. Louis...	12	88	80	140	26	19	78	186	137 WSYR-FM	Post City
	WAFL-TV	13	NBC	Birmingham	38	52	126	46	17	68	143	17 WAPF-AM	•• " " " "	Journal
	WSYR-TV	3	NBC	Syracuse...	43	47	117	127	13	10	14	143	17 WAPF-FM	Newark Star- Leader
													WTPA-FM	Long Press
													(Harrisburg)	and Star
													WTPA-TV	Journal
													WSYE-TV	"
													(Elmira-Corning)	"
													KOIN-AM	"
													(Portland)	"
													KOIN-FM	"
														State Island
														Advance
														Neva and
														Sunday
														Republican
														Vogue
														Mademoiselle
														Glamour
														House &
														Garden
														New York
														Chautauque
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Outlet Co.....	KSAT-TV	12 ABC	San Antonio	45	78	90	131	28	38	115	48	128	WFRV-TV (Green Bay)	WJAR-AM (Providence)	7	WDBO-AM (Orlando)	73	WDBO-FM (Orlando)	117	WXXK-TV (Cincinnati)	WPGH-TV (Pittsburgh)	KEMO-TV (San Francisco)	WATL-TV (Atlanta)	KDJO-TV (Rosenberg, Tx.)	WQXI-AM (Atlanta)	WQXI-FM (Cincinnati)	WSAI-AM (Cincinnati)	WSAI-FM (Cincinnati)	KHON-TV (Honolulu)	KHAW-TV (Hilo, H.)	KAIL-TV (Waikuku, H.)	KKDJ-EM (Los Angeles)	WWDJ-AM (Jacksonville)	KIMN-AM (Denver)	KYXI-AM (Oregon City, Ore.)	WVEC-AM (Hampton, Va.)	WVEC-FM (Hampton, Va.)	CATV (Alaska, N.C.; Maryland, N.C.; Virginia, and 5 others)
	WJAR-TV	10 NBC	Providence...	31	91	111	47	70	91	35	144																											
	**WNYB-TV	9 ABC	Syracuse...	43	107	144	143	8	18	2	102																											
	Overmeyer Inc. WDHO-TV	24 ABC	Toledo.....	45	100	139	144	7	29	142	31	117																										
Pacific and Southern Broadcasting Co.	WQXI-TV	11 ABC	Atlanta.....	17	143	129	126	112	99	75	23	44																										
Peninsula Broadcasting Corp.	WVEC-TV	13 ABC	Norfolk/ Newport News/ Hampton	44	137	137	135	42	95	141	49	91																										

TABLE 17.—Ownership Information—Continued

Owner	Station(s)	Chan- nel	Affili- ation	Market	Mkt. No.	Rank	Local News Comm.			Fin.	Min.	Wom- en	PSA	Interest or ownership		Other
							Rank	Local	News	Comm.				Other broadcasting	Publishing	
Plains Tele- vision Corp.	*WHNB-TV	30	NBC	Hartford/ New Haven	22	103	116	23	64	136	60	78	144	WICS-AM (Spring- field, Ill.) WICD-AM (Champaign, Ill.)	-----	CATV (Muskegon, Mich.; Me- tairieburg, Pa.; and Richmond, Ind.)
Poele Broad- casting Corp.	*WPRF-TV	12	CBS	Providence-- Albany/ Schenec- tady/ Troy	24	51	115	94	3	113	3	91	105	WJRT-TV (Flint) *WTEN-AM (Albany)	-----	-----
Pulitzer Pub- lishing Co.	KSD-TV	5	NBC	St. Louis....	12	66	36	68	74	108	121	83	45	*WCD-AM (Adams, Mo.) KSD-AM (St. Louis) KTV (Tucson)	-----	CATV (Clayton, Mo.)
Rahall Com- munications Corp.	*WLCY-TV	10	ABC	Tampa/St. Peters- burg	24	70	61	44	86	96	140	137	4	WLCY-AM (St. Petersburg) WLCY-FM WFBM-AM (Indianapolis) WFBM-FM WKAP-AM (Arlington, Va.) WVNC-AM (New York, N.Y.)	-----	CATV (Hills- borough, Fl.)
RCA.....	KNBC-TV	4	NBC	Los Angeles.	2	14	3	3	138	35	54	38	99	WNBC-AM (New York) WNBC-FM WRC-AM (Wash- ington) WRC-FM WMAQ-AM (Chicago) WMAQ-FM WVNC-AM (Chicago) WKYC-FM (Cleveland) KNBC-FM (Los Angeles)	-----	RCA Global Communi- cations RCA In- ternational Service Corp. RCA Insti- tutes Inc. RCA Sales Corp. RCA Dis- tributing Corp.

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Reeves Tele- com. Corp.	WHTN-TV	13 ABC	Charleston/ Hunting- ton	33	110	*	107	19	102	8	12	59	KNRR-AM (San Francisco) WJAS-AM (Pitts- burgh) WITH-AM (Baltimore) WITH-FM WKEE-AM (Huntington) WKEE-FM WBLG-TV (Lexington)		Hertz Corp.
													TelePromp- ter Corp. CATV (owns 127 systems; partially owns 6 other systems; holds 28 other franchises) Owens 80% of Marcus CATV Corp. & Parker Industries Inc. Owens 50% of The Cable Owens Tele- PrompTer Transmis- sion of Kausas Inc. Owens Inter- mountain Microwave of Louisiana Owens Tele- PrompTer Transmis- sion of New Mexico Owens Tele- PrompTer Transmis- sion of Oregon Inc. Thea Com- munications Muzak Corp.		

TABLE 17.—Ownership Information—Continued

Owner	Station(s)	Chan- nel	Affil- iation	Market	Mkt. No.	Rank	Local	News	Comm.	Fin.	Min.	Wom- en	Interest or ownership		Other
													Other broadcasting	Publishing	
RKO General Inc.	WHPQ-TV	13	ABC	Memphis	29	141	138	129	52	111	110	119	KHH-AM (Los Angeles)		RKO Radio Pictures
	WNAC-TV	7	ABC	Boston	6	17	37	41	27	69	19	112	KRTH-FM "WOR-TV (New York)		RKO Stanley Warner Theaters Inc.
													WOR-AM " "		General Tire and Rubber Co.
													WXLO-FM " "		General Tire and Rubber Co.
													WHBQ-AM (Memphis)		General Tire and Rubber Co.
													WIRB-FM " "		General Tire and Rubber Co.
													WRKO-AM (Boston)		General Tire and Rubber Co.
													WGMS-AM (Bethesda)		General Tire and Rubber Co.
													WGMS-FM (Bethesda)		General Tire and Rubber Co.
													KKEE-AM (San Francisco)		General Tire and Rubber Co.
													KFRC-FM (San Francisco)		General Tire and Rubber Co.
															Inc. CATV (owns 40 systems and partly-owns 12 others; holds 100% of 3 other franchises and con-rols interest in 11 others)
															*Mountain States Video Inc. CATV (20 franchises) CATV (Wilmington, De.)
Rollins Inc.	WCHS-TV	13	CBS	Charleston/Huntington	33	121	85	122	24	140	10	60	WCHS-AM (Charleston)		
													WEAR-TV (Pensacola)		
													WPTV-TV (North Pole, N.Y.)		
													WBEE-AM (Harvey, Ill.)		
													WAMS-AM (Wilmington)		
													WRAP-AM (Norfolk)		
													KSAV-AM (Santa Monica)		

TABLE 17.—Ownership Information—Continued

Owner	Station(s)	Chan- nel	Affili- ation	Market	Mkt. No.	Rank	Local	News	Comm.	Fin.	Min.	Wom- en	PSA	Interest or ownership		Other
														Other	broadcasting	
Spartan Broadcasting Corp.	WSPA-TV	7	CBS	Greenville/ Spartan- burg Ashville	40	129	103	57	117	121	74	101	104	WSPA-AM (Spar- tanning S.C.) WSPA-FM ⁴ WTHO-AM (Thomson, Ga.) WTHO-FM ⁴ WWLP-TV (Springfield, Ma.) WRLP-AM (Greenfield, Ma.) WRLP-TV ⁴		
Springfield Television Broadcasting Corp.	WKFP-TV	22	ABC	Dayton	39											
Standard Corp.,	*KUTV-TV	2	NBC	Salt Lake City	50	53	83	104	63	11	144	94	106		Ordan Standard *Salt Lake Tribune	
Storey Broad- casting Co.	WAGA-TV	5	CBS	Atlanta	17	60	70	5	124	79	71	126	100	WDEE-AM (Detroit)		Northeast Airlines CATV (20) systems in California and 3 sys- tems in Florida; 3 additional franchises in California and 3 in Florida)
	WITI-TV	6	ABC	Milwaukee	21	45	72	111	22	41	93	69	120			
	WJBK-TV	2	CBS	Detroit	5	133	93	99	116	106	40	132	122	WSBK-TV (Detroit)		
	WJW-TV	8	CBS	Cleveland	7	77	69	43	104	77	52	128	71	WSPD-AM (Toledo)		
	WSPD-TV	18	NBC	Toledo	45	119	124	113	41	107	54	142	108	WJW-AM (Cleveland) WPNA-FM (Philadelphia) KGBS-AM (Los Angeles) KGBS-FM ⁴ WGBS-AM (Miami) WHN-AM (New York)		
Sunbeam..... Sycamore Communica- tions Corp.	WKLT-TV	7	NBC	Miami	18	56	71	27	46	117	123	47	45	WZZM-FM (Kala- mazo/Grand Rapids)		
	WZZM-TV	7	ABC	Kalamazoo/ Grand Rapids	41	35	112	45	43	14	22	133	24			

Taft Broad- casting Co.	WBRC-TV	6 ABC	Birmingham	38	49	23	12	51	144	121	55	81	WKQ-FM (Chic- ago)	"	Time, Inc. Time, Sports Illustrated, About magazines Time-Life Books Dallas Times- Herald Newday Los Angeles Times Coast Orange Coast Daily Pilot
	WDAF-TV	4 NBC	Kansas City	23	134	34	72	144	131	103	135	81	WKRC-AM	"	
	WGR-TV	2 NBC	Buffalo	25	123	141	109	45	81	29	79	25	WTN-AM (Columbus)	"	
	WKRC-TV	12 ABC	Cincinnati	20	120	74	138	34	133	30	86	41	WTN-FM	"	
Time, Inc.	WTVN-TV	6 ABC	Columbus	28	136	128	130	68	105	18	46	76	WBRC-AM (Cincinnati)	"	T-M Com- munication Co. CATV (23 systems in California, New York, and Florida; 4 franchises in California and 3 in Florida)
													WBRC-FM (Cincinnati)	"	
													WGR-AM (Buffalo)	"	
													WGR-FM	"	
Times Mirror Corp.	WDAF-TV	4 NBC	Kalamazoo/ Grand Rapids	41	62	48	37	106	67	16	143	74	WDAF-AM (Kansas City)	"	20th Century Fox Film Corp.
													WDAF-FM	"	
													WNEP-TV	"	
													WNEP-TV	"	
Times Mirror Corp.	WOTV-TV	8 NBC	Kalamazoo/ Grand Rapids	41	62	48	37	106	67	16	143	74	KOGO-FM (San Diego)	"	20th Century Fox Film Corp.
														"	
														"	
														"	
Times Mirror Corp.	KDFW-TV	4 CBS	Dallas-Fort Worth	11	101	26	34	125	141	80	49	45		"	20th Century Fox Film Corp.
														"	
														"	
														"	
Travelers Corp.	WTIC-TV	3 CBS	Hartford- New Haven	22	16	63	28	5	110	48	42	13	WTIC-AM (Hart- ford-New Haven)	"	20th Century Fox Film Corp.
														"	
														"	
														"	
20th Century Fox	KMSP-TV	9 ABC	Minneapolis-St. Paul	33	122	109	141	15	126	147	43	122	WTIC-FM	"	20th Century Fox Film Corp.
														"	
														"	
														"	

TABLE 17.—Ownership Information—Continued

Owner	Station(s)	Chan- nel	Affil- ation	Market	Mkt. No.	Rank	Local	News	Comm.	Fla.	Min.	Wom- en	Interest or ownership		Other	
													PSA	Other broadcasting		Publishing
Washington Post Co., Inc.	WPLG-TV	10	ABC	Miami.....	18	6	10	1	87	52	126	19	56	WTOP-AM (Washington, D.C.)	Newsweek.....	Home Theater Network Co. (day TV)
	WTOP-TV	9	CBS	Washington, D.C.	10	55	79	10	120	50	66	3	40	WTOP-FM WJXT-AM (Jacksonville) WJXT-TV WCKY-AM (Cincinnati) WBZ-AM (Boston) WBZ-FM "	Post	
	KDKA-TV	2	CBS	Pittsburgh..	9	4	4	4	30	57	11	125	9	WBZ-AM (Boston)		Manufacturing of home ap- pliances; electronic equipment for industry
	KPIX-TV	5	CBS	San Fran- cisco	8	1	31	13	1	103	85	83	14	WBZ-FM "		apparatus for the gen- eration, transmission, and utilization of electricity, including that de- veloped through atomic energy
Westinghouse Corp.	KYW-TV	3	NBC	Philadelphia	4	5	2	7	23	123	73	70	3	KYW-AM (Phila- delphia)		CATV (Panama City, Fla., Tallahassee, Fla., Dub- lin, Ga., Milledge- ville, Ga., Swainsboro, Ga., Thom- asville, Ga., Valdosta, Ga., **Bronx, N.Y.)
	WBZ-TV	4	NBC	Boston.....	6	31	15	16	65	138	4	24	17			
	WJZ-TV	13	ABC	Baltimore...	19	2	6	59	4	24	128	57	2	KDKA-AM (Pitts- burgh) KDKA-FM " WINS-AM (New York) WVOW-AM (Fl. Wynne) WINY-AM (Chicago) KFWB-AM (Los Angeles)		

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CATV (franchise in Lynn, Ha- vel, Pa.) Class C Permit (Micro- Relay Inc.)	-----																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
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Chapter 4

HOW YOU CAN IMPROVE TELEVISION IN YOUR COMMUNITY

I. WHAT CAN YOU DO?

Now that you better understand how the quality of television broadcasting in your community compares to service provided in other markets, you may have other questions. One of these is probably where to go from here. In this chapter we will attempt to answer that question, explaining just how you can use the results of our report, as well as ways in which you can expand on our information within your own community.

Most citizens today believe that television broadcasters have an absolute right to program by whim, to present to millions of daily viewers whatever they might choose, in whatever sequence, at whatever time. But while that may be the heritage of American television, it most certainly is not the law. The law, in fact, is just the opposite. Our system of broadcasting was established pursuant to a statute that clearly provides that radio and television belong not to any businessman but rather to the public. A television station can only lawfully operate by serving the needs of its audience. The Supreme Court recently emphasized this view in ruling that "it is the right of the viewers and listeners, not the right of the broadcasters which is paramount."¹ The Federal Communications Commission in Washington is authorized and directed to enforce this concept of public service, but as you have seen from our study, in many cases its enforcement has not been as thorough as we—the viewing public—have a right to demand.

Precisely how do we go about demanding our rights as the "public" for whose "interest, convenience or necessity" the broadcast licensee is supposed to operate?² In the first place, there are a set of procedures within the Commission's regulatory process that have always been available for public input, although they were never adequately used until Dr. Everett Parker, Director of Communications of the United Church of Christ, convinced the D.C. Circuit Court of Appeals to reverse the Commission's policy of excluding the public in a case involving a television license renewal in Jackson, Mississippi.³ That case—perhaps the most significant landmark thus far in the area of citizen involvement in the regulatory process—eventually resulted in the refusal of the Commission to renew the license of the Lamar Life Broadcasting Company for WLBT-TV, Jackson, Mississippi, at least partly on the basis of racial discrimination in programming and employment. Later, in *WHDH, Inc.*,⁴ the television license held by a Boston newspaper, the *Herald Traveler*, was awarded to a competing

¹ *Red Lion Broadcasting Co. v. Federal Communications Commission*, 395 U.S. 367 at 390 (1969).

² As we have noted before, that language was made an irrevocable part of each licensee's obligation by the Communications Act of 1934, 47 U.S.C. § 309(a).

³ *Office of Communication of the United Church of Christ v. Federal Communications Commission*, 359 F. 2d 994 (D.C. Cir. 1969).

⁴ *WHDH, Inc.*, 16 FCC 2d 1 (1969).

applicant partially composed of leaders of various community groups, whose proposed programming carefully took into consideration the needs of the entire Boston viewing community.⁵ Current FCC Chairman Dean Burch, in a speech before the NAB, has called WHDH "a mistake we aren't likely to repeat soon;"⁶ nevertheless, it has established a precedent for license challenges that will not be taken nearly so lightly by licensees, *whatever* the "reassurances" of Chairman Burch.

Besides these *major* successful efforts at broadcasting reform, involving many years of litigation and thousands of dollars of expenses, there have, in recent years, been scores of smaller achievements by citizens and community groups in the constant battle to upgrade the quality of television broadcasting. Those have included reforms in programming practices, employment practices, concentration of control and other areas of local concern, and have often been brought about by pressures, publicity and negotiations in the community itself, completely outside the regulatory structure and jurisdiction of the FCC. But there have been many failures as well, due in part to lack of adequate citizen preparation for the herculean task of taking on the broadcaster. Many more intolerable situations remain unremedied because groups that *could* be exerting influence simply do not know how to do it effectively.

In this chapter, then, we will try to tell you how to use the information in this report, how best to use the additional information and techniques that will be available to you in your own community, and where to turn for more complete assistance than we can provide. We can only outline here the approaches we feel are the most potentially effective. But there are others who stand waiting to aid you in considerably greater detail if you choose to make a fight of your discontent with the inadequacy of the licensees in your community.

Although Congress and the FCC has promulgated a number of specific standards that a broadcaster theoretically is charged with maintaining, you should not assume that your grievance with your local station is hopeless merely because it does not fit neatly into one of those pigeonholes.⁷ Explicitly a part of the license of every broadcaster is his statutory mandate to operate in the "public interest," and the Supreme Court long ago held, in an opinion by Justice Frankfurter, that the "public interest standard is a *broad* one to be generously interpreted." The Commission, Frankfurter cautioned, was not to be merely a "traffic policeman" concerned with the technical aspects of broadcast regulation, but was to have a wide regulatory flexibility in determining the outer limits of the concept of the public interest.⁸

⁵ The license was, in fact, taken away from WHDH for reasons that included the licensee's relationship with its commonly owned newspaper, the Boston Herald Traveler, its de facto transfer of control, and its essentially absentee ownership. The incumbent's programming was held not to be a factor unless it has been "either quite good or very poor. [thus giving] some indication of unusual performance in the future." Thus, the Commission allowed itself to weigh the "average" expectations for future WHDH, Inc. programming against the civic-minded proposals of BBI, Inc., the challenging group. The latter was granted the license. See 16 FCC 2d, 8-9, 15-17.

⁶ Speech delivered Wednesday, March 28, 1973, to the NAB National Convention.

⁷ Some of those might include the fairness doctrine, overcommercialization, racial discrimination, or violation of rules pertaining to lotteries or personal attacks, and so forth.

⁸ *National Broadcasting Company v. United States*, 319 U.S. 190, at 215 (1943).

Nevertheless, the current bias of the FCC is sufficiently pro-industry that your complaint or petition will have a much greater chance of success if it relates to one of the established guidelines, which we will develop in greater detail below. For the moment, you should think of the following requirements: Broadcasters are required to ascertain the needs of a cross section of their audiences and to program with respect to these needs.⁹ They must be fair in handling controversial issues of public importance.¹⁰ They cannot discriminate in hiring and employment.¹¹ They are fully responsible for the advertising they broadcast.¹² Consolidation of ownership and control of the media (newspapers and broadcasting stations) is not unlawful, but is disfavored in the belief that it threatens the range of information available to the public.¹³ Finally, there are some specific restrictions on such practices as broadcasting to defraud or coerce.¹⁴

You, as members of the public, have a number of different ways in which you can enforce these broadcaster obligations, as well as the more general requirements of the public interest. Short of formal legal actions, you can deal with shortcomings of the television stations in your community by publicizing them via public relations campaigns, picketing, boycotts, moving a large number of citizens to complain, or by establishing a sufficient power base in your community to force a licensee to negotiate an agreement to upgrade his below-standard practices (if only out of fear of more serious legal challenges).

If these methods fail, there are more formalized legal procedures you can follow, including general complaints to the FCC, "fairness doctrine" complaints, petitions to deny the broadcaster's application for renewal of his license, and (although this requires the backing of more substantial moneyed interests) the WHDH style of "competing application" for the broadcaster's facilities. Citizens may also have significant input into the FCC rulemaking procedure, including (but not limited to) the filing of requests for Commission changes in its rules. This was the route chosen by the group called "Action for Children's Television."

Several overriding general principles deserve additional emphasis. In any of these actions you must know your facts thoroughly so that your position appears as well-reasoned and reasonable as possible, and you won't be shaken by station managers' threats or public relations rhetoric. Know precisely what it is you are trying to achieve. Don't muddy the issue with overly broad demands. Try to involve as many community groups as possible, so that you can move in a unified front

⁹ *Primer on the Ascertainment of Community Problems by Broadcast Applicants*, 27 FCC 2d 650 (1971).

¹⁰ *Report on Editorializing by Broadcast Licensees*, 13 FCC 1246 (1949). See also *Applicability of Fairness Doctrine in the Handling of Controversial Issues of Public Importance* (the "Fairness Primer"), 40 FCC 598 (1964).

¹¹ 47 C.F.R. § 73.650. See discussion of employment rules in Chapter 2 of this Report.

¹² The FCC does not directly regulate the content of commercials, but the Federal Trade Commission will consider complaints about false and misleading advertising against the advertiser (rather than the licensee). For a discussion of FCC "standards" of over-commercialization see the appropriate section of Chapter 1 of this Report.

¹³ See WHDH, Inc., *supra* note 4. See also the discussion of Commission ownership rules in Chapter 3 of this Report.

¹⁴ Specific provisions of the Act or Rules forbid such practices as rigging contests, 47 U.S.C. § 509, accepting payola, 47 U.S.C. § 508, broadcast of lotteries, 47 C.F.R. § 73.656, or fraudulent billing, 47 C.F.R. § 73.678.

with a maximum power base. Strengthen your "informal" bargaining position and support your public relations and education initiatives by showing a willingness and an ability to plot a legal course. Finally, always be aware of all the options. A complaint can be a very effective means of enforcing a specific standard, but in some cases a letter-writing campaign will actually accomplish the purpose of your complaint. On the other hand, a letterwriting campaign is often more effective if you can convincingly threaten a petition to deny. Do you understand all the alternatives? Remember, a petition to deny by a citizen group with a good power base potentially sends the broadcaster down an arduous and expensive road during which he risks some chance of loss of the station. In many cases this alone will strongly influence the broadcaster to settle your grievance "out of court." But don't use this procedure frivolously, because it wastes everyone's time, energy and money, and gives legitimate demands for reform a bad name. There are enough *serious* failings in most television licensees today that the few who are doing well should be allowed a little breathing space. Remember, we've identified the *best* stations in the country in this report as well as the worst.

II. HOW DO YOU PREPARE?

Your first step in attempting to upgrade the standards of your local broadcaster should be to acquire "A Guide to Citizen Action in Radio and TV," (Citizen Guide) written by Marsha Prowitt and available without charge from the Office of Communication of the United Church of Christ.¹⁵ It describes FCC programming and performance standards, explains the acknowledged avenues of effective public action, and indicates where to go if you need assistance. It's the best available manual for citizen participation in broadcasting. You might also want to take a look at *How to Talk Back to Your Television Set*.¹⁶ A third source, which lawyers will find particularly useful, is "The Primer on Citizen's Access to the Federal Communications Commission," published by the Citizen's Communications Center in Washington, D.C.¹⁷ Finally, there are helpful materials available from the FCC itself. One of the best is the "Procedural Manual" ("The Public and Broadcasting"), a special issue of the Federal Register of September 29, 1972.¹⁸

A. Your Community Organization

If you have not already formed a citizen's communication group, there are instructions for doing so in the *Citizen Guide*. In addition, you should check the *Sources* Appendix of this report (Appendix B) for a description of already existing national or regional groups with which you can affiliate or who can provide a model for your local operation. If your primary interest is in children's programming, for ex-

¹⁵ For address, see Appendix B.

¹⁶ Nicholas Johnson. *How to Talk Back to Your Television Set*, Bantam Books (1970).

¹⁷ For address, see Appendix B.

¹⁸ *The Public and Broadcasting: a Procedure Manual*, Federal Register, Vol. 37, No. 190, p. 20510 (September 29, 1972). See also the *Primer on Ascertainment*, *supra* note 9, and the *Fairness Primer*, *supra* note 10.

ample, you should get in touch with ACT (Action for Children's Television); if it is the treatment of minorities in broadcasting, then BEST (Black Efforts for Soul in Television) may be able to guide you.¹⁹ In each case, however, there are other groups in the midst of the fray, and there should be no reason why you or your group should have to go it alone.

If you are just one concerned citizen, or at most a small group, your next step should be to broaden your base by enlisting the support (and hopefully the resources) of existing groups right in your own community. It may even surprise you how many of them there are, not knowing how to effect changes but as concerned as you about the low quality of broadcast service.

Look, for example, to your local chapter of the NAACP or ACLU. Most cities in the top 50 markets have them, and while the organizations may not be capable of formally endorsing your plans, the individuals involved may well be able to help with the sort of activity you have in mind. See if the National Organization for Women (NOW) or a similar women's rights group exists in your community. Try the membership of the League of Women Voters, or the ever-present variation on the theme of "Committee for Good Government." Look to the campuses of local or regional colleges or universities for interested faculty, students or groups. The journalism classes of the local high school may become convinced to turn your ideas for improving local television into year-long class projects. Churches often have civic action groups. Some labor union locals may be persuaded to take up your banner. Consider Senior Citizen Clubs, as many of the members have considerable leisure time and are often therefore both the greatest victims of the shortcomings of television and the greatest potential source of monitors.

Use your imagination. If television can stand a heap of improving in your community, an awful lot of people are going to be dissatisfied with it. It's up to *you* to find them and let them know that something can be done. If none of the above groups is interested enough to be aroused into action, or when you feel it's necessary to broaden your base, consider the particular shortcomings of *your* broadcasters and find organizations that would have a special interest in them: Does a station's program logs show it runs just sixty public service announcements a week—and mostly at 3:00 in the morning to boot? Very well, call on the local charities, boys clubs and civic organizations and explain to them what broadcasters in other cities are doing for groups like theirs. The same could be done with *local* programming or any other category; the organizational permutations and combinations are bounded only by your imagination and energy.

Local groups should be convinced that television service should be better for a number of reasons. First, you need demonstrable community support when dealing with the broadcasters and when going before the FCC, if that becomes necessary. Also, broadcasters, like everyone else, begin to get the message once they hear something enough times from enough sources. Community support is also neces-

¹⁹ Address for these and all other groups mentioned may be found in Appendix B.

sary to raise funds for newspaper advertisements, supplies, and other expenses. Moreover, these groups may provide volunteer help for mailings, observation and even (in the face of hard line broadcaster intransigence) "confrontations" via picketing, leafleting, and so forth.

Finally, here are a few public relations hints on dealing with other people and groups in your community (common sense for the most part, but worth repeating). Work *with*, not *against*, the leaders of others groups in your community; every group of people is going to have a different set of priorities, and the beauty of getting different groups together to improve television service is the broad front on which your broadcaster's actions can be challenged, and *enthusiastically*, by a variety of divergent opinions. In other words, don't try to force your priorities on others, but allow them to find their natural position in your concerted attack, to work *through* the contacts you make, not in spite of them. If the minister or rabbi in one congregation can be convinced by his membership to take up the shortcomings of television in a sermon or in his weekly newsletter it might be more productive than your own direct intercession; allow people to *involve themselves* rather than directing them (except, of course, in the stages of data collection and observation that requires trained guidance). And remember, it will always inure to your benefit to rally a wide range of viewpoints and philosophies to your cause: a *broadcaster* by definition has a special knowledge of *broad* support; he knows when he has it because the rating services tell him so, and he is easily tuned out by small numbers because small numbers have come to mean "no profit." He will know, therefore, when *your* support is broadly based. And while there *are* effective things you can do in a small group (or even as an individual), the clout you will have in the early stages of your observation and negotiation will be considerably greater if broad segments of your entire community are behind you.

B. Gathering Information

Once you and your group have determined, either on your own or through the information provided in this Report, that one or more of the licensees in your community could stand some improvement, your next step is to accumulate information about the broadcaster and his practices from as wide a range of sources as possible. In this section we will briefly discuss each of those sources and suggest ways they can be put to good use.

Basically, there are three major types of research to be done, and each will be covered in turn. They utilize: 1) independently published materials, such as the *TV Factbook*, *TV Guide* and the program logs in your local newspaper; 2) the various types of information on file at the FCC, most of which is also available in the local community in the public file each licensee is required to maintain; and 3) the actual programming practices of the station, as observed and recorded by the members of your group. These three major sources of information may also be augmented by such additional methods as interviewing members of the community (as a check, perhaps, on a station's ascertainment of community problems) or interviewing the broad-

casters themselves. You may well discover other methods in your community that are related (or can be adapted) to your specific needs and requirements.

1. The most elementary tools of the citizen's group are the daily or weekly program logs found in *TV Guide* or your local newspaper; they are an important source of information and as good a place as any to begin your analysis of the stations in your community. You will find you can use these logs as a rough check against the information found in the more complete logs filed by the licensee with his renewal application, and a close look at the entire programming week in such a log should reveal some important facts about the station immediately to which you can begin to apply the criteria and standards discussed in the course of this report. It should not be difficult to estimate, from program logs, such factors as the total hours a station broadcasts per week; the extent of a licensee's news programming, including total hours of news per week, news as a per cent of all programming, local/regional news, total local/regional hours of news, local/regional news as a per cent of all news; similarly with public affairs, live programming, local programming, other non-entertainment programming, and the type and amount of different types of programming during prime time.

You can also use *TV Guide*, or some other program log, to begin to analyze types of information that cannot be adduced from a glance at a renewal application. When, for example, is the local news usually run? If it is a network affiliate, does the station normally substitute old movies for the network's public affairs programs? What programs are normally broadcast to children? This procedure should, in fact, become an important step in preparing a list of items with which you eventually hope to confront the broadcaster, and you may even be constrained to analyze such things as the diversity or sameness of programming offered by *all* the stations at one given hour or the practice of a network affiliate in filling his prime time "access" period (does he use tired game shows or innovative local programs)? A word of caution, however; many stations have developed techniques for giving the false impression to viewers (and even to networks) that they are carrying shows (often network public affairs programs) when in fact they intend at the last minute to switch on an old movie. Thus, the *TV Guide* or local newspaper may not give an accurate record of a station's program week, and *must* be checked against your own observation. There is no legal penalty for such last-minute switching—unless, of course, the licensee represents in program logs filed with the FCC (or to the network in question) that he *has carried* a show he has in fact pre-empted. But a pattern of such behavior can clearly be used to fuel the claim that the licensee is operating on principles of self, not public, interest.

Additional information about a licensee can be obtained from the tools of his own trade, including sources like *TV Factbook*, by which advertisers inform themselves of a licensee's audience size, advertising rates and so forth, and *Broadcast Yearbook*, which contains comparable and additional miscellaneous information. Even the re-

ports of the various rating services would be helpful (if you can get them).

2. Your second major source of information will be the files of the FCC in Washington or the "public files" maintained by the local stations in your town.²⁰ Much of this data will consist of filings of various FCC-required forms, a brief survey of which is given below. For a more complete description of the forms as well as the rules regarding their public inspection, see another publication available from the United Church of Christ, *A Guide to Understanding Broadcast License Applications*, by Ralph M. Jennings.

The following material is available for public inspection at the Federal Communications Commission, primarily in files in the Public Reference Room, located on the second floor at 1919 M Street, N.W., Washington, D.C.: 1) the license renewal applications and related filings for the previous two renewal periods; 2) "history cards" briefly noting the major events, including renewals, assignments and violations, in a station's history; 3) docket files, for those licensees engaged in a hearing on some issue, such as one whose renewal is being challenged or one which is applying for some new or improved facility; 4) employment information; 5) fairness doctrine complaints against a station; 6) ownership information; and 7) files containing petitions for rulemakings affecting the licensees in your community (or television broadcasting in general). This information is available for public inspection between the hours of 8:00 AM and 4:30 PM on working days.

The same application forms, ownership and employment reports, and many types of viewer complaints must, by Commission rules, be made available for public inspection at the station or at some other readily accessible place. In addition, every station must also keep detailed logs of its programming (and every other aspect of its operation as well), with notations made, on a minute by minute basis, for every program, commercial, and psa that has aired. (Logs do *not*, however, contain transcripts of the *contents* of the programs.) The station files a set of these logs for its "composite week" (see definitions at the end of Chapter 1) with its renewal application, and while these logs are destroyed by the FCC after a station's license has been renewed,²¹ composite week duplicates must be kept in the station's public file at all times. These logs are of considerable value, since they reveal many facets of a licensee's operation not apparent from the brief summaries and percentages spelled out in the renewal application, or in newspaper TV program guides. An FCC rulemaking may soon make them available to the public for the entire three-year period of the broadcaster's license.²²

For a number of reasons it is always advisable to expend a considerable effort studying the files available at the local station. First,

²⁰ As required by Commission Rules, 47 C.F.R. § 1.526.

²¹ This is done because the FCC claims it lacks storage space for the unwieldy logs, even though the logs would be far more helpful to public interest researchers than the "summaries" of that information that go into the renewal application.

²² Notice of Proposed Rulemaking in the Matter of Petition for Rulemaking to require broadcast licensees to retain certain program records, Docket No. 19667, FCC 73-23, 38 F.R. 1511, 3 P & F R.R. Current Service 53:355 (January 8, 1973).

you will thereby let the broadcaster know that you are concerned with his performance—and that you mean to do a thorough job of studying it. In addition, the information kept at the station is sometimes both more accessible and more complete than that found at the FCC. Finally, in all likelihood you will here encounter your first expression of broadcaster hostility or the evasive tactics with which he will attempt to avoid showing you his file, or to withhold some of it from you as “misplaced” or “not available this week,” or generally to intimidate you while you are examining it. This is a useful lesson for you to learn early. Just remember, the law is crystal clear—the files must be conveniently available to you,²³ and if you find they are incomplete or if you are not well received or otherwise denied access by the station, you should *immediately* bring it to the attention of the Complaints and Compliance Division of the FCC, by telephone if necessary, and demand an immediate investigation into the broadcaster’s intransigence.²⁴

The FCC forms themselves should be relatively easy to understand, with the aid of the United Church of Christ manual described above. The license renewal application, Form 303, is the most important application in the file (and the source of most of the quantitative conclusions reached in this Report). For most large television stations, the exhibits attached to it make the 303 a major document indeed, often measured in pounds rather than pages. But while it will be useful and informative to read the numerous exhibits submitted by a broadcaster with his application for renewal (if only because this is the same type of document you might well be challenging the *next* time his license expires), the critical programming information will be contained in just a few short sections.

Section IV-B of form 303 contains the basic information on television program service, and the most important parts of Section IV-B are: Part I, on ascertainment of community needs, Part II, concerning past programming (news, public affairs and other programming are stressed), Part III describing proposed programming, Part IV setting out past commercial practices, and Part V indicating proposed commercial practices.

Each television licensee must also file a form 395 employment report with the FCC every year. These reports focus on the employment of minorities and women and are the source of Chapter 2 of this study. The general policy of equal employment as expressed in the Commission’s own rules and policy statements²⁵ is that no person shall be discriminated against in employment because of race, color, religion, national origin or sex. Form 395 is set up to provide information as to the number of minority (and female) employees relative

²³ 47 C.F.R. § 1.526. Stations often will attempt to withhold part of their files, and especially their composite week program logs. Since these logs enable you to determine how many commercials (for example) are being run during children’s programs, or how many of a station’s psas are run at 2:00 AM, they are important and must be shown to you; if the licensee does otherwise he risks possible fine for violation of Commission rules.

²⁴ Local FCC offices will not be of much assistance in matters like this, since they are generally equipped only to handle technical complaints or problems. Inquiries should be addressed directly to Washington.

²⁵ See general discussion of these rules and policies in Chapter 2.

to the total number of employees in categories such as officials and managers, professionals, laborers and service workers.

Each broadcaster must also file ownership reports on form 323. Ownership reports provide detailed information about the licensee's business affairs, his interests outside broadcasting, and various contracts and agreements involving the licensee and his principal employees. New forms are filed whenever there is a change in the required information.

3. The final area of major citizens group research should be the careful observation, monitoring, of the licensee's programming, the one major type of research truly beyond the scope of our particular study. There is a difference, of course, between merely observing a station's programming and actually monitoring it for specific information. How much you do will depend in large measure on how many people you have and how dedicated they are. But you must remember that the more ambitious your goals the greater the attention that will be paid to your final product—and the more difficult it will be to complete with a staff consisting of unpaid volunteers.

The United Church of Christ Office of Communication has made an art of the process of monitoring television stations, even to the point of achieving official FCC recognition in a radio license companion case to *WLBT*, of the equality of a "monitored" week (properly executed) with the Commission's own composite week for the purpose of program analysis.²⁶ But Dr. Everett Parker's monitors are all carefully trained, and they work in teams that include (for each station) two monitors, two "back up" observers (or supervisors) and one aural tape engineer, all of whom are on duty and recording at all times during the broadcast week under consideration. If you feel the resources of your group are sufficient for such an undertaking, contact Ralph Jennings (in New York) or Jane Goodman (in Washington) for further information about the Church's training techniques.²⁷

Many of the same facts can also be gathered with fewer people, with more simple recording forms, and a couple of stopwatches to time commercials, interruptions, program segments, and so forth. Even this process, if you are careful to limit the information you seek, will produce valuable data about the service a licensee is giving, which can always be used to augment data available from other sources as well to adduce significant conclusions that could not otherwise be made.

It is crucial, whether you are monitoring or observing, to know precisely what it is you are looking for, and to have simple forms that can be filled in while the programming is being observed. Again, the United Church of Christ experience should be invaluable in this regard, since it has developed specific forms to satisfy the needs of various types of monitors or observers. A selection of these are attached at the end of this section.

The list of things one *might* look for in this process is almost endless. Your particular interests will no doubt give you some direction. You or your group might well begin by holding one or more sessions in which you all merely observe the programming of the station or sta-

²⁶ *Lamar Life Insurance Co.*, 38 FCC 1143 (1965).

²⁷ For addresses see Appendix B.

tions of interest to you, discuss what you see among yourselves, and don't bother to record any information. It might be useful to include child psychologists, social workers, psychiatrists, and so forth, in these early sessions if they are available to you. Once you break down into smaller units for actual monitoring, the experiences and observations of others in your group will prove invaluable.

Even if you are acutely aware of the needs and predilections of your organization, however, you cannot hope to insure accuracy and corroboration of your findings if you attempt to monitor alone. A minimum of two people are required, and they must be spelled every few hours by fresh workers. Many believe a supervisor is necessary to monitor the monitors, and later be available to corroborate the testimony of the monitors as to the procedures used. For even two people working without supervision will have a difficult time of it unless their data recording forms are as simple to use as possible.

You should start the actual process of monitoring with a form that has columns for time of day, name of "program," category of the program (entertainment, news, education, commercial, or psa). What you will be doing is writing down the entire broadcast day from sign-on to sign-off. Or perhaps you will want to start by emphasizing "prime time" (6:00 to 11:00 PM on TV or 5:00 PM to 10:00 PM in some areas). It is important to list name of show, nature of show (is programming category) and duration. You should also include a column in which you indicate whether the show was produced nationally or locally—this is usually done from general knowledge, and by noting the opening and closing credits.

You should plan to monitor for *at least* an entire week—and preferably one in which a degree of programming normalcy can be assumed. You would not, for example, monitor during Christmas week or election week—or the first week of the new fall schedule. In the end you will have amassed a list of all programming offered to the audience by all the stations in your community (or the network affiliates, or others which you have selected for emphasis). If you are comparing all the stations in your community, it is important that you monitor them during the same week so more accurate comparisons can be made.

An important ingredient in your data collection process is the attention paid to time. Use several clocks in your monitoring exercise. If several television sets are to be monitored in one room simultaneously one master clock can serve all monitors, but each individual group should have one or two cumulative stop watches in order to time the separate segments in the broadcast day (this is especially true for shorter segments like commercials and psa's).

In evaluating the performance you will want to compare your findings to what the broadcasters proposed to do in their last license renewal applications. This should be done regardless of the more specific (i.e., black-oriented or children-oriented) programming you are seeking to evaluate, since it will give your effort a wider scope and the broadcasters proposals (from his form 303) are readily available for your inspection. If on the 303 a licensee proposed that 5% of its broadcast week would be devoted to news and public affairs

programming, for example, you can easily acquire monitoring data that tells you whether or not the licensee is doing that. If the broadcast day is 10 hours long that means that 30 minutes should have been devoted to that category of programming.

By the same token, you will probably want to add up the amount of programming in each category. If the station was on the air for a total of 130 hours during the week you will want to know the percentage of time devoted to news broadcasts, entertainment shows (variety, "soap operas," game shows, religious programming, commercial messages, public service announcements, or old movies. You will also most likely want to note the percentage of programs locally produced as opposed to those fed directly from the network, those syndicated, or those produced by any source independent of the local station.

In addition to corroborating (or challenging) the proposals and reported categories of the broadcaster's renewal application, you will quickly find that monitoring can also add dimensions to those same categories that would not otherwise be available through inspection of a station file or TV Guide-type program log. Form 303 will tell you how many 60-minute segments of the broadcast week include more than 12 minutes of commercials, but it will not tell you whether those segments occur in the early evening hours, when the majority of people are watching, or during children's programs. Form 303 will tell you how many public service announcements the licensee runs in the course of a week, but it will not tell you when they are run (are they bunched together between old movies at 2:30 in the morning?), or how long they are (some psa's are just 10 seconds long—or less), or how responsive they are to local needs (as distinguished from Army recruiting spots, or Red Cross appeals). As you can see, the dimensions for analysis are virtually endless, if the monitoring is done in sufficient detail. By putting it all together you will be able to obtain a far more precise view of your broadcasters' performance than is available even in a report of this magnitude, which surveys all the material available at the FCC.

What else should you specifically look for in monitoring a station's performance? The *Citizen Guide* asks several questions which monitoring and other information gathering will help answer: Has each station lived up to the promises made in its license application? Has each station properly ascertained the needs and interests of the entire community? Do the programs offered truly respond to the needs of the community as identified on the license renewal application? Is fair employment opportunity reflected in the station's employment figures or only in policy statements?

In the few paragraphs that follow, we will attempt to set out a few of the many specific things you can look for—in doing so, we hope to spur you on to develop a more precise list well attuned to the needs and shortcomings in your own community.

You might start, for example, with commercialization. Although the license renewal application tells you little that is specific, it is important to know how many commercial *minutes* per hour are being shown during prime time, or during children's time on Saturday and

Sunday morning. In addition, you might look for the *frequency* of commercials and of program interruptions. (It's not just the minutes of commercials that is annoying, it's the *number* of non-program announcements, and the number of program interruptions.) How many commercials are for *local* businesses (thereby providing at least something remotely in the nature of a local service) and how many simply for national products? How deceptive are the broadcaster's "station break" policies? (Does the station announce "Beat Your Wife will be right back after station identification"—and then break for six commercials?) What products are being advertised to children? To adults?

You can perform a similar analysis with public service announcements. When are they shown? What is their subject matter (are they of local interest)? Are they stale (from the station's ever-handly library) or topical? Do most of a station's psa's come from the same source—i.e., the Advertising Council (which is a rather conservative group of advertisers with a virtual monopoly on the psa "business"), or the U.S. Government?

Analyze the news in equal depth. Instead of just the number of minutes of news listed in the program guides per day (or week), clock the precise number of minutes actually devoted to *news*. Break that down into weather (some stations spend more than 20% of a 30 minute "news" show on the charming personality of their weather person), sports, "entertainment" and hard news. Check the content of your television news show against the content of your local paper—do the stations just cover three of the biggest headline stories and forget the rest? Are there some controversial subjects that never seem to make the news? Some segments of your community that are overlooked? Are most of the events press conferences, most of the persons interviewed politicians or other "establishment" figures rather than ordinary citizens? How much of the "local" news show is actually *local* news and how much is some announcer reading wire service clips of national or regional stories? How much effort does the station expend covering the news? Is it strictly limited to the "rip-and-read" style of reportage, with an occasional still photo flashed on the screen, or does it actually employ camera crews and in-field announcers to cover personally those items of greatest local interest? If your city has a population that is, say, 20% black, what percentage of the news is devoted to covering the activities of the black community? How much time is wasted on news shows by jokes and entertainment from the "gang" (as on many segments of ABC's "Eyewitness News" format)—remember, in your average 30 minute news show you may only be getting 15 minutes or less of actual *reporting* to begin with.

Examine children's programming for a wide variety of factors, including commercialization, amount of cheap animation versus role-stimulating live entertainment, amount of "children's" programming that consists of little more than ancient series reruns or movies, or racial or sexual stereotypes on children's television. What is presented for children between 3:00 PM and 6:00 PM each day? Is age differentiated programming available for those under 6, 6 to 12, teenagers, and so forth, or is it just all "children's" programming?

Violence scales similar to the one recommended recently by the National Institute of Mental Health²⁸ might be employed to measure the amount of violence in television programming for a particular station. Is there more violence in television programming for a particular station? Is there more violence in children's programming? Is it commonly presented as an effective means of achieving desirable ends? Are the goals and values reflected in television programming really acceptable at all?²⁹

Monitor for violations of the Fairness Doctrine.³⁰ To meet his obligations, the broadcaster has to fulfill two basic requirements. First, controversial issues, or issues of public importance, must be discussed. Second, balanced coverage of different viewpoints on these issues must be presented. The broadcaster has to bear the expense of meeting the fairness obligation if no paid advertising or programming is available, and he also must seek out spokesmen representing the other side of an issue. You may want to determine whether or not, and in what manner, broadcasters are meeting these requirements. A third aspect of Fairness Doctrine monitoring would be determining the percentage of controversial issues presented that are locally relevant. For example, inflation and the war in Southeast Asia may well have local angles and impact, but they are not, strictly speaking, "local" issues. The arguments on either side of whether to build a new freeway through the heart of town might be.

The wealth of information available from careful monitoring is, as you can see from this partial listing, enormous. If you can possibly muster the resources from within your organization, it is an option well worth the time and effort.

Examples of the United Church of Christ "Observer's Report Form" are given in the next four pages.

²⁸ See Coatsworth and Rubinstein, ed., *Television and Social Behavior: Media Content and Control*, 29-34, National Institute of Mental Health (1971).

²⁹ See, e.g., the *Staff Reports of the Surgeon General's Scientific Advisory Committee on Television and Social Behavior*, published by the National Institute of Mental Health, Department of Health, Education and Welfare (1971). See especially the volume entitled *Television and Growing Up: The Impact of Televised Violence*.

³⁰ See *Fairness Primer*, *supra* note 10. See also Prowitt, *Guide to Citizen's Action*, at 10.

Federal Communications Commission Reports

OBSERVER'S REPORT FORM

Viewing Assignment				
Station _____	Channel _____	Location _____		
Program Title _____	Source _____	Type _____		
Broadcast Date _____	Time Program Begins _____	Time Program Ends _____		

Observer Information									
Observer's Name _____	Phone _____		State _____		Zip _____				
Street _____	City _____								
Sex: (Circle) Male _____ Female _____	Nationality: (Circle) Spanish-surname Americans _____ Other _____								
Age: (Circle) 15-20 _____ 21-30 _____ 31-40 _____ 41-50 _____ 51-60 _____ 61-70 _____ Over 70 _____									
Highest Grade in School Completed: 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 16+									

Description of Program				
DIRECTIONS: Complete this box while you watch the assigned program. Be objective and accurate. The space below has been divided into five columns. In Column 1, describe each incident where a Spanish-surname American appears or where a minority issue involving Spanish-surname Americans is discussed. In Column 2, indicate the number of Spanish persons that were pictured in this incident. (Mark "0" if no Spanish appeared.) Note the number of Spanish who spoke in the incident in Column 3. If this incident involved the discussion of an issue concerning Spanish-surname Americans check (✓) Column 4. In Column 5, indicate the approximate length of the incident described.				
1. Description	2. Spanish Appeared (number)	3. Spanish Spoke (number)	4. Spanish Minority Issue Discussed	5. Time

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OBSERVER'S REPORT FORM - Side 2

After the program is over answer the following questions. Here we seek your thoughtful reactions to what you have seen. Be sure you explain your answers.

1. Were racial issues treated fairly? (Do not answer if racial issues were not discussed.)
Yes _____ No _____ Don't Know _____ Explain below.

2. Were blacks accorded the same treatment as whites? (Do not answer if blacks did not appear.)
Yes _____ No _____ Don't Know _____ Explain below.

3. Do you feel that this program adequately treated the interests of the black community?
Yes _____ No _____ Don't Know _____ Explain below.

4. How could this program have better served the black community?

5. If you have further comments about this program, please give them in the space below.

Return this form to: Office of Communication, United Church of Christ, 289 Park Avenue South,
New York, New York 10010

All data and materials that are gathered will become part of the permanent files of this project
and cannot be returned.

OBSERVER'S REPORT FORM

Station <u>WXXK</u>	Channel <u>51</u>	Viewing Assignment <u>Bellevue S. Dakota</u>
Program Title <u>News</u>	Source <u>L</u>	Type <u>N</u>
Broadcast Date <u>Jun 1, 1971</u>	Time Program Begins <u>6:30 P.M.</u>	Time Program Ends <u>7:00 P.M.</u>

Observer Information	
Observer's Name <u>BETTY MONTUVA</u>	Phone <u>ME-4-2001</u>
Street <u>150 BIRD ST.</u>	City <u>BELO</u> State <u>S.D.</u> Zip <u></u>
Sex: (Circle) Male ☐ Female ☒	Race: (Circle) Red ☒ Other ☐
Age: (Circle) 15-20 ☐ 21-30 ☒ 31-40 ☐ 41-50 ☐ 51-60 ☐ 61-70 ☐ Over 70 ☐	
Highest Grade in School Completed: 1 2 3 4 5 6 7 8 9 10 11 ☒ 12 13 14 15 16 16+	

Description of Program

DIRECTIONS: Complete this box while you watch the assigned program. Be objective and accurate. The space below has been divided into five columns. In Column 1, describe each incident where an Indian appears or where an issue involving Indians is discussed. In Column 2, indicate the number of Indians that were pictured in this incident. (Mark "0" if no Indians appeared.) Note the number of Indians who spoke in the incident in Column 3. If this incident involved the discussion of an issue involving Indians check (✓) Column 4. In Column 5, indicate the approximate length of the incident described.

1. Description	2. Indian Appeared (number)	3. Indian Spoke (number)	4. Indian Minority Issue Discussed	5. Time
Reported robbery by Indian college student. Shown entering handcuffed into police station.	1	0		20 sec.
Former Indian resident interviewed regarding present job in construction.	1	1	✓	1 min.
Indians shown protesting Indian Lore Exhibition.	2+	0	✓	45 sec.
Possible government takeover of reservation land reported. Indians shown demonstrating and reported using unnecessary force and violence.	2+	0	✓	1 min.

New Jersey Project
OBSERVER'S REPORT FORM

Viewing Assignment																		
Station <u>WCBS</u>	Channel <u>2</u>	Location <u>New York, New York</u>																
Program Title <u>6 O'clock NEWS</u>	Source <u>L</u>	Type <u>N</u>																
Broadcast Date <u>6/2/77</u>	Time Program Begins <u>6 PM</u>	Time Program Ends <u>6⁵⁵ PM</u>																
Observer Information																		
Observer's Name <u>Lester Harris</u>	Phone <u>(201) 422-7621 (Home)</u>																	
Street <u>14 Elm Terrace</u>	City <u>So Orange</u>	State <u>New Jersey</u>	Zip <u>07017</u>															
Sex: (Circle) <u>Male</u> Female	Length of New Jersey Residence <u>5 years</u>																	
Age: (Circle) 15-20 21-30 <u>31-40</u> 41-50 51-60 61-70 Over 70																		
Highest Grade in School Completed:	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	16+	
Description of Program DIRECTIONS: Complete this box while you watch the assigned program. Be objective and accurate. The space below has been divided into six columns. In Column 1, describe each incident where a New Jersey resident appears or where an issue involving New Jersey is discussed. In Column 2, indicate the number of New Jersey residents that were pictured in this incident. (Mark "0" if no New Jersey residents appeared.) Note the number of New Jersey residents who spoke in the incident in Column 3. If this incident involved the discussion of an issue involving New Jersey check (✓) Column 4. If the incident involved a film made in New Jersey, check (✓) Column 5. In Column 6, indicate the approximate length of the incident described.																		
1. Description	2. N. J. Resident Appeared	3. N. J. Resident Spoke	4. N. J. Issue Discussed	5. Film Report	6. Time													
Report of Legislature approving Cahill's Sports Authority Bill, enabling N.J. to build a stadium for N.Y. Giants. No comment from Giants president about move to N.J. meadows.	0	0	✓		25 sec.													
Report by Phil Slavin about Robt Morasso's race for the Bloomfield City Carnival. Emphasis on RM's refusal to discuss his role as Brian Bonet in CIA-ordered death of Vietnam agent. Showed RM at Coffee Chateau talking about high priority taxes.	1	1	✓	✓	60 sec.													
Commuter report on N.J. TPKE delay.	0	0	✓		5 sec.													

III. WHAT ACTION CAN YOU TAKE?

Once you have gathered your relevant information about a broadcaster's practices, what are your available lines of attack—and which will be best suited to changing those practices to make them more responsive to the needs of the local community? In this report we will merely outline the various avenues for reform, since there is no need for us to go into the detail you can find in other sources. Specifically, the Prowitt *Guide to Citizen Action* discussed earlier in the chapter³¹ provides detailed guidance in each of the areas outlined below, and additional sources will be suggested in Appendix B.³²

One category of potential community action involves the use of legal machinery: the filing of petitions to deny the renewal of a broadcaster's license (or the grant of transfer of control or any other application he might make), informal objections to such applications, formal complaints regarding the alleged violation of an FCC rule or policy, or competing applications designed to acquire the right to broadcast over the licensee's frequency for yourself or your group.

Other action might include educational or public relations campaigns designed to bring the station's shortcomings to the attention of the community as a whole, complaints made to the licensee himself regarding specific aspects of his operation, or direct negotiation with the licensee regarding specific suggestions for improvement or reform in his service to the public.

A. Public education and public relations

Once you have familiarized yourself with the performance of the stations in your market area and zeroed in on the specific problems or shortcomings, you will almost certainly want to bring your findings to the attention of the community. This should be done in order to draw additional support from that community, as well as to bring some initial pressure on the licensee to correct the shortcomings himself. The methods of publicizing your findings can be as varied as your imagination allows, and could include issuing press releases for use by non-broadcast media,³³ including such disparate sources of potential publicity as student newspapers or shopping ad weeklies (or even other broadcast media that may be willing to cooperate with your effort); organizing letter-writing campaigns or radio talk show call-ins; arranging to discuss or lecture at meetings of church, social or community groups or at high schools or colleges; enlisting the support of local politicians (or political candidates); and so forth.

³¹ Hereinafter cited as *Citizen's Guide*.

³² Lawyers should see especially two Office of Communications, United Church of Christ Publications: Jennings, *Guide to Understanding Broadcast License Applications and Other FCC Forms*, and the forthcoming Bennett, *Representing the Audience in Broadcasting Proceedings*.

³³ You will run into problems, of course, in communities where the broadcast and non-broadcast media are wholly or partially controlled by the same entities. That is the situation, unfortunately, in far too many of the cities in our study. See the discussion of this problem in Chapter 2 of this Report.

B. Informal complaints

Complaints can sometimes achieve results if made in sufficient quantity (or with sufficient legal specificity). Their major drawback, of course, is that they depend on the goodwill of the broadcaster for their success. You will therefore achieve the best results if you are careful to avoid overly-general complaints and limit yourself to alleging the violation of specific Commission rules or policies, such as the fairness doctrine, equal employment rules, equal time provisions, and so forth. Such informal complaints should, as suggested by Ms. Prowitt in the *Citizen Guide*, 1) state the facts clearly as you see them, including your name, the station's call letters, and the specific actions complained of; 2) cite a standard to which you can relate your grievance or proposal; and 3) request a *specific* remedy, such as a new kind of program, an increase in minority employment or the opportunity to present the other side of a controversial issue or respond to a personal attack.²⁴

In addition to complaining directly to the station you may want to broaden the scope of your action by complaining at the same time to its biggest local or national advertisers, the network with which the station is affiliated (if any), the local chamber of commerce—in short, anyone you feel might be in a position to care about or perhaps attempt to influence the licensee's activities. In some cases, the subject matter of the complaint may dictate additional parties who should receive it: if the complaint concerns the absence of local public service announcements, for example, complaints might be delivered to local hospitals or boys clubs or service organizations which would benefit from improved performance as well as to the station. As a final step, of course, you should bear in mind that complaints can also be made to the FCC—or, indeed, to other government agencies, such as the FTC or the EEOC, at state and city levels as well as federal. These will be mentioned again under "legal action" below.

C. Negotiation

Direct negotiation between your group and the broadcaster can conceivably bring about the greatest degree of change possible with limited organizational resources. Once you have set *specific* goals for improvement of the service of broadcasters in your community, and have acquired relatively wide support for those goals, much may be accomplished in face-to-face negotiation with the broadcaster *provided*: 1) your goals have as their basis one or more of the specific obligations implicitly or explicitly required of the broadcaster by statute or Commission rules or policies, and 2) you can demonstrate to the broadcaster your determination to pursue your goals through more formal legal remedies if negotiations are not successful. For further information regarding this tactic, we would refer you once again to the *Citizen Guide*, which includes as an appendix a copy of just such

²⁴ *Citizen's Guide*, at 19.

an agreement negotiated between community groups and broadcasters in Texarkana, Ark.³⁵

D. Formal legal complaints

If informal actions fail to induce the necessary changes in broadcast service to your community, you will probably want to pursue the various legal remedies available to you. We can do little more than enumerate these remedies within the scope of this report; but again, there are a number of sources for lawyers and laymen that set out pretty clearly the procedures you can pursue.³⁶ You have four basic avenues of FCC legal attack available to you. In order of increasing difficulty, they are: complaints to the Commission; informal objections to a licensee application; formal petitions to deny an application, either for renewal of a license or some other operating modification; or a competing application for the frequency on which the current licensee is operating.

Complaints to the Commission are perhaps the least effective form of legal action, but they have the virtue of being simple to generate. Moreover, if a complaint is carefully drawn, so that it raises a significant *legal* issue concerning the licensee's violation of some Commission statute, rule or policy, it can require at the very least that the Broadcast Bureau act to determine whether or not it has merit, thereby creating a ruling capable of being appealed to the full Commission and, ultimately, to the United States Court of Appeals.³⁷ Don't allege generalizations in complaints to the Commission, such as "this station discriminates against blacks and Spanish-surnamed citizens." Go into sufficient detail, based on your observations or research, to allege specific instances of violation and to request specific remedies. *Force the Commission to accept or deny* the premise of your complaint—not merely dismiss it as "overly vague," or thank you for providing information which merely will be "associated" with a station file—because by doing so you will almost certainly be forcing the station to defend its policies. The more specific your complaint and your request for a remedy, in other words, the more likely is the station to feel the pressure of your desire for change.

E. Informal objections

Informal objections are generally associated with the application of a licensee for renewal of its license.³⁸ Unlike a petition to deny, however, this type of legal action may be taken at any time up to the actual grant of a licensee's application, and must be considered by the Commission in its process of weighing the evidence for against the licensee. The element of time is therefore not so important with

³⁵ *Id.*, Appendix D, at 39.

³⁶ See sources cited in notes 18 and 32 *supra* and Appendix B of this Report.

³⁷ Appeal to the courts need not be prosecuted in the D.C. Circuit Court alone, although most end up in that circuit. You should bear in mind that the Circuit Court of Appeals sitting in your part of the country, although it might not necessarily possess the communications or regulatory "expertise" of the D.C. Circuit, could conceivably bring a fresher outlook on local problems to their decision.

³⁸ 47 C.F.R. § 1.587.

an informal objection as with a petition to deny, and that is perhaps its chief virtue; however, it stands to reason that an informal objection, in order to be taken seriously, must involve allegations of considerably greater importance than those which are acceptable in a normal petition to deny. It is well to reserve this legal tool for serious allegations, such as fraud or some other such gross malfeasance, discovered when it is too late to file an actual petition to deny. And while the procedural rules regarding the content of an informal objection are less stringent than those concerned with more formal petitions, you would do well to treat this type of application every bit as seriously as you would any other (particularly if it is the only option open to you because you have not been able to complete your research before the cut-off date for petitions to deny has been passed).

F. Petitions to deny

Petitions to deny must be filed by a "party of interest" in the licensee's application proceeding, pursuant to rather stringent rules of procedure set out by the Commission in a number of sources to which we've alluded above.³⁹ As members of the community the broadcaster is supposed to serve, you should have no difficulty establishing yourself as a "party of interest,"⁴⁰ and you should be prepared at each stage of your research and negotiation process to put together a well-documented petition setting out carefully all the reasons you feel the licensee has failed to serve the public. The *Citizen Guide* spells out this requirement in greater detail:

If, for example, one of your charges is that the station discriminates against minority people in its employment, you should support this allegation with specific information which might include statistics on the low employment of minority people in each category of station responsibility as compared with population of minority groups in the city or of minority people who have applied for employment; signed statements (affidavits) of minority persons who have been denied employment, citing specific violations of the equal employment rules and other relevant material.⁴¹

In other words, the more carefully organized you make your allegations, the greater the likelihood of a positive FCC response—and the greater the pressure on the licensee to compromise with your group on reform of his programming or other practices. Since, as the *Citizen Guide* points out, the petition to deny is a "severe action . . . costly and time consuming [to both parties]," you should only consider it as "the last resort when other means of achieving necessary change . . . have failed."⁴² Nevertheless, you should from the beginning be prepared to demonstrate to the broadcaster that you have the patience, the

³⁹ 47 C.F.R. § 1.580. See also the *Procedure Manual*, supra note 18.

⁴⁰ See, e.g., *Office of Communication of the United Church of Christ v. FCC*, 359 F.2d 994 (1966), in which the Court of Appeals held that the Commission's "traditional position that members of the listening public do not suffer any injury peculiar to them and that allowing them standing would pose great administrative burdens" was erroneous and not in with the Commission's own pronouncement that "individual citizens and the communities they compose owe a duty to themselves and their peers to take an active interest in the scope and quality of the television service which . . . has a vast impact on their lives and the lives of their children . . ." (emphasis in the opinion), 359 F.2d 994, 1000-1006.

⁴¹ *Citizen's Guide*, at 27.

⁴² *Id.*, at 26.

resources and the legal capacity to carry through with a challenge to the renewal of his license.⁴³

A petition to deny a licensee's application for renewal has one major temporal drawback: such an application need only be filed once every three years, and once a station's license has been renewed a community group may find itself with considerably less influence for the next two years or so. There are, however, other types of proceedings in which you may be able to participate, and you will do well to determine whether any of the licensees in your community are or will be involved in any of them. Any time a licensee makes a major alteration in his facilities, for example, he is required to file an application for such an alteration which may be challenged by a community group. If he seeks to move his principal studio, for example, or shift his antenna to a new location or increase his power he is required to apply just as if he were seeking a new facility.

Note carefully the business plans of the licensees in your community; are any intending to sell their stations in the near future, assigning or transferring their license to a *new* licensee? You will want to *insist* on becoming a party to that sort of transaction, especially if it involves a television station, so as to ensure a higher level of service by the new licensee. Examine his proposals, and bring to his attention the shortcomings of the previous licensee.

Finally, you will want to apprise yourself of the nature and extent of a licensee's holdings *other than* the station in your community. An overwhelming majority of the licensees in this study, for example, own two or more broadcast facilities,⁴⁴ and it will be the rare licensee whose licenses all expire in the same renewal period. You may well be able successfully to apply pressure on the substandard licensee in your community by working with groups in other cities in which it holds licenses. This type of activity requires little but increased coordination, and this as well as each of the other activities mentioned above are simply illustrative of the axiom that the more you know about *every* aspect of your licensees the more effective you can be in dealing with their shortcomings in your community.

G. Competing applications

One last, drastic measure you may be inclined to pursue, particularly if you are saddled with a licensee who blatantly refuses to serve the public interest, is a competing application for use of the frequency itself. Such an application can be made, pursuant to Commission rules, whenever a broadcaster's license comes up for renewal. It should not be made frivolously, but only after careful deliberation and accumulation of sufficient operating capital and programming and technical expertise; if each of the latter is available, however, and your allegations

⁴³ You should always attempt to include one or more lawyers in your group, and your legal counsel should always be prepared on the various filings that could be made against a station relatively quickly. His or her preparation should therefore begin as early as possible, and preferably before any contact with the station has been made. Many of the people cited in this chapter or listed in Appendix B stand ready to help you understand the legal vicarities of the potential challenges and complaints outlined here, in the *Citizen's Guide* and in the sources cited.

⁴⁴ See the extensive cross-ownership tables in Chapter 3 of this Report, but bear in mind even they are far from complete in terms of various individuals' or corporations' non-broadcast interests.

of misfeasance are sufficiently serious, you may wish to compete for the frequency, which does, after all, belong to the *public* and not the existing licensee. Note carefully the rules and policies that must be followed by a competing applicant, however, and make certain you are both willing and able to meet the requirements of each step in the procedure.⁴⁵

APPENDIX A

SYSTEMS METHODOLOGY *

I. INTRODUCTION

In this section, we hope to give the reader some insight into the computer programming methods implemented to produce the results of this project. It should be noted that because this was a pilot project and the goals that were to be accomplished were not clearly ascertained at the inception of the analysis stage, the computer programming algorithm hereinafter set forth is not the most efficient; however, it has proven to be viable.

Basically, the analysis was conducted in two parts. The first part concerned the analysis of the data relating to female and minority employment practices of the broadcast licensees. The information processed pursuant thereto was acquired from the FCC Form 395, which is an annual employment report filed by all broadcasting stations. The second stage of the analysis concerned the licensee's programming profile and included an analysis of the station's news, public affairs, local programming, commercialization, public service announcements and financial data. The source of this data was the FCC Form 303 which is filed by the broadcaster every three years in application for renewal of his license.

The computer language used in this analysis was Fortran IV compiled on an IBM 360 model 40. Other languages might have been used; however, Fortran or a similar type of language was necessary to perform the numerous computations on the raw data from the FCC forms. The language may become inefficient when many sorts and cross-tabulations have to be performed but a balance had to be found between the flexibility of the type of output and the efficiency of the computer program itself. The Fortran IV language, in contrast to cross-tabulation and sorting languages, is adaptable to any form of input and output data.

The programs themselves are simply too lengthy to be included in this report, but a copy may be obtained by writing to Larry Harbin, in care of Commissioner Nicholas Johnson, Federal Communications Commission, Washington, D.C. 20554 (mail will be forwarded).

II. EMPLOYMENT ANALYSIS

The input data for the employment programs was comprised of the computer card for each licensee and 50 additional cards containing information pertaining to the top 50 market areas, such as the name of the city in which the licensee is located and the percentage of minorities in the SMSA. The format of the employment data cards is shown at the end of this appendix.

The first step performed by the computer program was the reading of 50 data cards containing information on the market numbers, the percentage of minorities in that particular SMSA, and the name of the city designated by that market number. Then, as each data card pertaining to the employment profile of the individual licensee was read, a first array was formed that contained the elements of the output data. Those elements were the station identifiers [call letters, market number, etc.], percentage of minorities in the market area, the number of job positions in the top five job categories, the number of minorities in the top five job categories, the percentage of minorities in the top five job categories, the total number of employees, the total number of minorities em-

⁴⁵ See, e.g., the FCC Policy Statement on Comparative Hearings, 1 FCC 24 293 (1965).

*High-speed computations for this project were carried out at the Georgetown University Academic Computation Center.

ployed, and a ranking factor. A second array was formed with the same station identifiers along with the number of top five positions, number of females employed in those positions, and the percentage of females in those positions.

Once all the data cards were read into the computer and all the manipulations and computations were performed to create the arrays, a simple sort routine operated on the arrays to order the first array [minority employment] according to the magnitude of the ranking factor, e.g. from highest to lowest. A numerical integer was assigned to each station from one to the number of stations analyzed [200 maximum]. A similar ordering was performed on the same array according to the magnitude of the percentage of minorities employed.

With regard to the second array [female employment], a single ordering was performed according to the percentage of females employed in the top five job categories.

The results of this employment program produced three different rankings containing the information as previously described. Those three ranks include two ranks re minority employment, one by ranking factor and the other by percentage of minorities employed; and one ranking re female employment by percentage of females employed in the top five job positions.

Input Format For Employment Data—Source: FCC Form 395

Label	Card columns	Data type
Call Letters.....	1-4	Alpha
Market Number.....	5-6	Integer
Network Affiliation.....	7-9	Alpha
Total Official & Managers.....	10-12	Integer
Total Professionals.....	13-15	Integer
Total Technicians.....	16-18	Integer
Total Sales.....	19-21	Integer
Total Craftmen.....	22-24	Integer
Total Employees.....	25-27	Integer
Female Official & Managers.....	28-29	Integer
Female Professionals.....	30-31	Integer
Female Technicians.....	32-33	Integer
Female Sales.....	34-35	Integer
Female Craftmen.....	36-37	Integer
Female Total.....	38-39	Integer
Black Males Official & Managers.....	40-41	Integer
Black Males Professionals.....	42-43	Integer
Black Males Technicians.....	44-45	Integer
Black Males Sales.....	46-47	Integer
Black Males Craftmen.....	48-49	Integer
Black Males Total.....	50-51	Integer
Other Male Minorities:		
Top 2.....	52-53	Integer
Top 5.....	54-55	Integer
Total.....	56-57	Integer
Black Females Official & Managers.....	58-59	Integer
Black Females Professionals.....	60-61	Integer
Black Females Technicians.....	62-63	Integer
Black Females Sales.....	64-65	Integer
Black Females Craftmen.....	66-67	Integer
Black Females Total.....	68-69	Integer
Other Female Minorities:		
Top 2.....	70-71	Integer
Top 5.....	72-73	Integer
Total.....	74-75	Integer

III. PROGRAMMING ANALYSIS

The analysis of the programming of the licensees is somewhat more complicated than that of the employment analysis. The input data comprised three sets of data cards. The first set of input cards included one data card for each station.

containing information relating to public service announcements, news, public affairs, etc. The format and exact contents of such data cards are described at the end of this text. The second set of cards is the same as that for the employment program containing information relevant to each of the top fifty market areas. The third set of cards contained confidential financial information for each licensee, coded so as to reveal relative information about a licensee's performance, but not specific figures.

Similar to the employment program, the first step performed was the reading of the fifty data cards; containing information about the market areas; into a market array. The second operation was the reading of the financial information for the licensees into what will be called a financial array.

As each programming data card was read, means were provided for retrieving market area information from the market array and financial information from the financial array. Computations were performed to convert figures of hours and minutes into a decimal representation of hours in order to facilitate other computer functions. A maximum of 200 broadcast stations may be analyzed with this program.

The first output from this program is a ranking of the licensees according to a local programming indicia computed by the sum of the prime time local programming and total local programming divided by two.

The second ranking is simply an ordering of the licensees according to the sum of the quantities of news, public affairs, and "other" programming, as depicted on the FCC Form 303.

The third ranking is an ordering of the licensees according to the number of public service announcements, and the fourth ranking is an ordering according to the number of hours in the composite week having more than 12 minutes of commercials. The latter ranking is ordered from lowest to the highest.

The financial ranking is an ordering of the licensees according to the magnitude of the ratio of programming expenses over broadcast revenues.

The composite ranking is a conglomeration of four different ranking criteria. They include (1) local programming, (2) news, public affairs and "other," (3) commercialization, and (4) financial evaluations. In order that each element have an equal weight or have equal effect on the composite ranking, the licensees were assigned a number between zero and 100 for each of the four evaluation criteria, and the composite ranking is then based on an average of those four numbers.

With regard to local programming, the number one licensee sets the scale. I.e. the indicia of 20.92 represents 100/100. An indicia of zero is represented by zero, however, the lowest indicia 1.71 is 8.17/100, representing the worst station in the top fifty markets with regard to local programming.

A similar analysis is made with the news, public affairs, and "other." 45.83 hours represents 100 and 12.40 hours represents 27.05/100, zero being the lowest.

Re the commercialization ranking, the worst licensee sets the scale on the low end. The licensee with the highest number of 60 minute segments having 12 or more minutes of commercials is assigned a value of zero on the scale between zero and 100. A licensee with zero segments having 12 or more minutes of commercials is assigned a value of 100; however, the best licensee in this report is rated 96.61/100, with two segments having 12 or more minutes of commercials.

Concerning the financial factor, the licensee having the highest program expense/revenue ratio is assigned 100. A ratio of zero is assigned zero on the scale.

Once all of these factors have been computed, a final composite figure, by which the composite rank is ordered, is defined by an average of the four factors. Thus, the optimum performance of a licensee, according to the four pre-defined criteria, is 100. The best licensee is rated at 63.5, which is well below its peak performance of 100, assuming that any station can perform 100 in each of the four evaluation criteria.

Input Format For Programming Data—Source: FCC Form 303

Label	Card column	Data type
Call Letters.....	1-4	Alpha
Market Number.....	5-6	Integer
Network Affiliate.....	7-9	Alpha
Composite Week:		
Hours.....	10-12	Integer
Minutes.....	13-14	Integer
News:		
Hours.....	15-16	Integer
Minutes.....	17-18	Integer
Public Affairs:		
Hours.....	19-20	Integer
Minutes.....	21-22	Integer
"Other":		
Hours.....	23-24	Integer
Minutes.....	25-26	Integer
Local Programming:		
Hours.....	27-28	Integer
Minutes.....	29-30	Integer
Prime Time Local Programming:		
Hours.....	31-32	Integer
Minutes.....	33-34	Integer
Public Service Announcements:		
Hours.....	35-36	Integer
Minutes.....	37-38	Integer
Commercialization:		
12-16.....	68-69	Integer
16+.....	70-71	Integer

Input Format For Financial Data

Label	Card column	Data type
Call Letter.....	1-4	Alpha A4
Ratio: Program Expense/Gross Revenue.....	5-9	Real F5.1

Input Format—Market Area Data Cards

Label	Card columns	Data type
Call Letters.....	1-4	Alpha A4
Number.....	5-6	Integer 12
True Market Number.....	7-8	Integer 12
SMSA.....	9-12	Real F4.1
Location.....	13-32	Alpha 5A4

APPENDIX B

Listed below are selected citizens organizations and resource materials that might be useful to you.

CITIZENS ORGANIZATIONS

Mr. Thomas Asher
Media Access Project
1910 N Street, N.W.
Washington, D.C. 20036

Mr. Charles Baker
Institute of American Democracy, Inc.
1330 Massachusetts Avenue, N.W.
Washington, D.C. 20005

Professor John Banzhaf
George Washington University
National Law Center
720 20th Street, N.W.

Washington, D.C. 20006
Mr. Bill W. Wright
Black Efforts for Soul in Television
1015 North Carolina Avenue, S.E.
Washington, D.C. 20003

CITIZENS ORGANIZATIONS—Continued

Mr. Robert Choate 1346 Connecticut Avenue, N.W. Room 535 Washington, D.C. 20038	Action for Children's Television 33 Hancock Avenue Newton Centre, Massachusetts 02159
Mr. Allen Ferguson Public Interest Economics Center 1714 Massachusetts Avenue, N.W. Washington, D.C. 20036	American Council for Better Broadcasts 17 West Main Madison, Wisconsin 53703
Mr. Ted Jacobs Center for the Study of Responsive Law 1908 Q Street, N.W. Washington, D.C. 20009	Communications Policy Committee American Civil Liberties Union 156 Fifth Avenue New York, New York 10010
Mr. Frank Lloyd Executive Director Citizens Communications Center 1812 N Street, N.W. Washington, D.C. 20036	Corporation for Public Broadcasting 888-16th Street, N.W. Washington, D.C. 20006
Mr. Joseph Onek Center for Law and Social Policy 1751 N Street, N.W. Washington, D.C. 20036	Institute for Policy Studies 1520 New Hampshire Avenue, N.W. Washington, D.C. 20036
Mr. Richard L. Ottinger Hydeman and Mason 1225 19th Street, N.W. Washington, D.C. 20036	National Association for Better Broad- casting 373 Northwestern Avenue Los Angeles, California 90004
Mr. Tracy A. Westen Stern Community Law Firm 2005 L Street, N.W. Washington, D.C. 20036	National Citizens Committee for Broad- casting 609 Fifth Avenue New York, New York 10017
Mr. Ralph Nader Public Citizen, Inc. 1346 Connecticut Avenue Washington, D.C. 20036	Rev. Everett Parker Director (also Jane Goodman and Ralph Jennings) Office of Communication United Church of Christ 289 Park Avenue South New York, New York 10010
Mr. Mark Green Project on Corporate Responsibility 1609 Connecticut Avenue, N.W. Washington, D.C. 20009	Television, Radio & Film Commission The Methodist Church 476 Riverside Drive New York, New York 10027
	The Network Project Earl Hall Columbia University New York, New York 10027

THE NETWORKS

American Broadcasting Cos., Inc. 1330 Avenue of the Americas New York, New York 10019	National Broadcasting Co. 30 Rockefeller Plaza New York, New York 10020
Columbia Broadcasting System, Inc. 51 West 52nd Street New York, New York 10019	Mutual Broadcasting Co. 135 West 50th Street New York, New York 10019

INDUSTRY ASSOCIATIONS

National Association of Broadcasters 1661 N Street, N.W. Washington, D.C. 20036	Television Information Office 745 Fifth Avenue New York, New York 10022
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FEDERAL GOVERNMENT

Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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16. *In the Matter of a Personal Attack*, (FCC 67-795) Office of Information, F.C.C.
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18. *Cable Television, a Guide to Citizen Action*, by Monroe Price and John Wicklein; Office of Communication, United Church of Christ, 1971.
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20. *Guide to Citizen Action in Radio and Television*, by Marsha O'Bannon Prowitt; Office of Communication, United Church of Christ, New York, 1971.
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APPENDIX C

ADDITIONAL TABLES OF INFORMATION

These additional Tables deal largely with the same statistics analyzed in the text of the study. Except for Tables 1-a and 8-a, they present the information of Chapters 1 and 2 *by market* rather than in order of their rank, in order to enable the reader to compare the performances of the three affiliates in each of the 50 cities.

Table 1-a is the same composite ranking found in Tables 1 and 2, but with the relative performances of each station more precisely detailed by the analytical tool of relating the hours-and-minutes (etc.) performance levels to a 0 to 100 scale, as detailed in Appendix A.

Table 8-a ranks the affiliates solely on the basis of their total percentage of minority employment (*without* adding in the factor of the number of minorities in the SMSA).

The Tables in this Appendix are as follows (with reference to the corresponding tables in the main text in parentheses):

- Table 1-a (Tables 1 and 2)
Composite Rank of all Programming Criteria (on a 0-100 scale)
- Table 2-a (Tables 1 and 2)
Composite Rank of all Programming Criteria (by market)
- Table 3-a (Table 3)
Hours and Rank of News, Public Affairs and Other (by market)
- Table 4-a (Table 4)
Public Service Announcements (by market)
- Table 5-a (Table 5)
Commercialization (by market)
- Table 6-a (Table 6)
Hours and Minutes of Local Programming (by market)
- Table 7-a (Table 7)
Ranking Based on Ratio of Program Expenses to Gross Revenues (by market)
- Table 8-a (Table 8)
Network Affiliates Ranked by Percent Minorities Employed
- Table 9-a (Tables 8 and 8-a)
Network Affiliates Ranked by Percent Minorities Employed (by market)
- Table 10-a (Table 8)
Percent Minorities Employed/Percent Minorities in SMSA (by market)
- Table 11-a (Table 9)
Percent Minorities Employed in High Pay Positions (by market)
- Table 12-a (Table 10)
Percent Women Employed in High Pay Positions (by market)

Network Affiliates Ranked by Composite of All Programming Criteria

Rank	Call letters	Net. aff.	Mkt. No.	Location	Local	News, P.A. and other	Commer.	Financial	Composite
1	KPIX	CBS	8	San Francisco	54.98	84.44	96.61	56.30	73.08
2	WJZ	ABC	19	Baltimore	66.89	66.15	77.97	77.18	72.06
3	KING	NBC	41	Seattle-Tacoma	41.83	68.15	69.49	98.74	88.96
4	KDKA	CBS	6	Pittsburgh	68.61	89.09	90.85	67.60	67.77
5	KYW	NBC	78	Philadelphia	78.10	89.05	93.93	68.14	66.38
6	WPLG	ABC	18	Washington, D.C.	56.33	100.00	43.76	91.27	65.99
7	WMAL	ABC	10	Washington, D.C.	48.29	70.88	46.10	82.12	65.60
8	WTAE	ABC	44	Pittsburgh	44.82	70.91	93.22	63.18	65.44
9	WTMY	CBS	48	Gush-High Pt-Win Sal.	44.82	72.58	44.07	90.77	65.11
10	WWV	NBC	20	Portland	68.74	76.29	37.29	75.25	63.64
11	WWL	CBS	31	New Orleans	50.00	82.87	28.81	100.00	63.49
12	WRC	NBC	10	Washington, D.C.	45.42	61.80	44.07	74.41	62.84
13	WABC	ABC	1	New York City	71.51	93.42	11.86	51.73	62.07
14	KNBC	NBC	2	Los Angeles	60.56	67.16	28.81	53.73	61.81
15	WIBC	NBC	9	Pittsburgh	43.74	74.96	74.98	68.73	61.18
16	WTTIC	CBS	22	Hartford-New Haven	53.98	69.78	64.24	84.53	61.11
17	WNAC	ABC	6	Portland	50.00	63.67	49.15	79.89	60.88
18	KATU	ABC	26	Portland	54.79	83.75	37.29	64.48	60.52
19	WHAS	NBC	35	Louisville	58.32	74.95	40.68	84.99	60.74
20	KGRA	NBC	28	Sacramento-Stockton	58.32	74.95	33.90	65.79	59.53
21	WRNS	CBS	28	Portland	59.76	78.69	38.98	69.27	59.39
22	WRNS	CBS	28	Columbus	64.34	64.98	40.68	76.39	58.80
23	KIAR	NBC	45	Phoenix	54.94	64.36	16.95	69.75	58.80
24	KOMO	ABC	16	Seattle-Tacoma	100.00	48.73	25.42	76.60	58.80
25	WLWT	NBC	20	Cincinnati	41.83	91.53	25.42	73.74	58.80
26	WCBS	CBS	1	New York City	47.21	86.45	45.48	64.41	58.75
27	KMOX	CBS	30	St. Louis	58.84	55.67	45.48	64.41	58.65
28	WSM	NBC	41	Oklahoma City	61.00	61.59	67.80	95.74	58.29
29	WST	NBC	37	Albany-Schenectady-T	21.08	67.02	44.07	53.23	58.06
30	WAST	NBC	17	Atlanta	67.79	81.78	44.07	44.58	58.06
31	WSB	NBC	6	Boston	47.52	59.45	32.20	92.30	57.96
32	KSZ	CBS	19	Salt Lake City	47.52	70.18	35.59	55.81	57.70
33	WMAZ	CBS	50	Baltimore	63.23	69.09	45.76	84.36	57.42
34	WZLW	ABC	41	Kalamazoo-Gr Rapids	30.45	69.09	45.76	67.94	57.29
35	WDSU	NBC	31	New Orleans	59.96	67.09	33.90	67.94	57.11
36	WRTV	NBC	14	Indianapolis	45.22	70.73	47.46	65.05	57.02
37	WBEN	CBS	48	Buffalo	48.01	77.24	40.68	62.48	56.89
38	WBEN	CBS	1	New York City	47.01	81.38	32.20	68.73	56.89
39	WNRG	NBC	9	Los Angeles	59.88	70.73	35.59	57.39	56.43
40	KNXT	NBC	15	Houston	56.00	70.73	35.59	57.39	56.43
41	KPRC	NBC	20	Cincinnati	31.99	67.78	30.51	74.50	56.19
42	WCFO	CBS							

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43	WMFQ	NBC	Chicago	15.25	63.50	68.17
44	WVLR	ABC	Sacramento-Stockton	15.25	63.50	68.17
45	WVLR	ABC	Milwaukee	15.25	63.50	68.17
46	WCAU	CBS	Philadelphia	15.25	63.50	68.17
47	WYR	NBC	Syracuse	15.25	63.50	68.17
48	WBAL	NBC	Baltimore	15.25	63.50	68.17
49	WBRC	ABC	Birmingham	15.25	63.50	68.17
50	WPVI	ABC	Providence	15.25	63.50	68.17
51	WPR	NBC	Birmingham	15.25	63.50	68.17
52	WAFB	NBC	Salt Lake City	15.25	63.50	68.17
53	KUTV	CBS	Oklahoma City	15.25	63.50	68.17
54	WTV	CBS	Washington D.C.	15.25	63.50	68.17
55	WCKT	NBC	Miami	15.25	63.50	68.17
56	WQAI	NBC	Charlotte	15.25	63.50	68.17
57	WQAI	NBC	San Antonio	15.25	63.50	68.17
58	KSTP	NBC	Minneapolis-St. Paul	15.25	63.50	68.17
59	WAGA	CBS	Atlanta	15.25	63.50	68.17
60	WSIX	ABC	Charlotte	15.25	63.50	68.17
61	WTV	ABC	Minneapolis-St. Paul	15.25	63.50	68.17
62	WXII	NBC	Indianapolis	15.25	63.50	68.17
63	KTRK	ABC	Indianapolis	15.25	63.50	68.17
64	WTV	ABC	Indianapolis	15.25	63.50	68.17
65	WTV	ABC	Indianapolis	15.25	63.50	68.17
66	WTV	ABC	Indianapolis	15.25	63.50	68.17
67	WTV	ABC	Indianapolis	15.25	63.50	68.17
68	WTV	ABC	Indianapolis	15.25	63.50	68.17
69	WTV	ABC	Indianapolis	15.25	63.50	68.17
70	WTV	ABC	Indianapolis	15.25	63.50	68.17
71	WTV	ABC	Indianapolis	15.25	63.50	68.17
72	WTV	ABC	Indianapolis	15.25	63.50	68.17
73	WTV	ABC	Indianapolis	15.25	63.50	68.17
74	WTV	ABC	Indianapolis	15.25	63.50	68.17
75	WTV	ABC	Indianapolis	15.25	63.50	68.17
76	WTV	ABC	Indianapolis	15.25	63.50	68.17
77	WTV	ABC	Indianapolis	15.25	63.50	68.17
78	WTV	ABC	Indianapolis	15.25	63.50	68.17
79	WTV	ABC	Indianapolis	15.25	63.50	68.17
80	WTV	ABC	Indianapolis	15.25	63.50	68.17
81	WTV	ABC	Indianapolis	15.25	63.50	68.17
82	WTV	ABC	Indianapolis	15.25	63.50	68.17
83	WTV	ABC	Indianapolis	15.25	63.50	68.17
84	WTV	ABC	Indianapolis	15.25	63.50	68.17
85	WTV	ABC	Indianapolis	15.25	63.50	68.17
86	WTV	ABC	Indianapolis	15.25	63.50	68.17
87	WTV	ABC	Indianapolis	15.25	63.50	68.17
88	WTV	ABC	Indianapolis	15.25	63.50	68.17

Network Affiliates Ranked by Composite of All Programming Criteria—Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	Local	News, P.A. and other	Commer.	Financial	Composite
98	WMC	NBC	29	Memphis	53.71	61.71	22.03	57.87	48.53
99	WEN	CBS	37	Albany-Schenectady-T.	31.08	53.33	37.29	73.88	48.66
100	WFLA	ABC	41	Oakland City	46.18	46.44	33.90	67.93	48.61
101	WFLX	NBC	36	Louisville	23.92	32.15	62.71	78.40	48.54
102	WJAP	NBC	34	Dallas-Fort Worth	24.70	67.71	47.46	53.76	48.41
103	WJAB	ABC	22	Portland	29.48	68.25	37.29	57.91	48.29
104	WJRH	ABC	22	Hartford-New Haven	29.48	61.56	40.68	50.88	48.15
105	WTVH	CBS	49	San Diego	47.00	77.00	15.25	50.55	48.10
106	KFMB	ABC	45	Phoenix	37.09	63.07	38.38	51.86	48.00
107	KTVK	CBS	45	Toledo	37.40	63.07	38.38	51.86	47.78
108	WTOL	CBS	32	Denver	51.00	62.65	60.40	75.59	47.74
109	KMGH	ABC	45	Toledo	18.69	27.05	60.40	75.59	47.54
110	WDHO	ABC	11	Dallas-Fort Worth	56.97	72.00	18.64	41.83	47.54
111	KDFW	CBS	2	Los Angeles	26.00	50.11	32.30	80.71	47.33
112	KDFW	ABC	22	Hartford-New Haven	28.92	78.40	38.98	45.03	47.04
113	WJNB	CBS	14	Indianapolis	42.59	64.55	35.59	45.44	46.97
114	WJNB	CBS	27	Sacramento-Stokton	33.07	71.31	18.64	64.86	46.77
115	KXTV	NBC	36	Los Angeles	94.46	60.11	32.30	60.29	46.77
116	WAVE	ABC	43	Syracuse	8.17	28.67	67.80	80.67	46.58
117	WHEN	CBS	43	Syracuse	16.57	36.49	32.30	67.86	46.40
118	WHEN	ABC	50	Salt Lake City	16.57	36.49	32.30	67.86	46.40
119	KCPX	ABC	33	Charleston-Huntington	17.93	53.89	57.03	71.18	46.23
120	WLTN	ABC	40	Orville-Spring-Ashv.	15.62	39.71	41.03	66.24	46.23
121	WLOS	ABC	49	San Diego	20.86	54.18	32.30	65.71	46.23
122	KGTU	NBC	32	Denver	48.01	61.85	25.42	46.35	45.41
123	KOA	CBS	16	Seattle-Tacoma	44.82	60.62	25.42	50.76	45.40
124	WLS	ABC	7	Chicago	48.13	65.85	1.69	64.53	45.05
125	WLS	ABC	7	Chicago	30.28	60.00	18.64	70.28	44.80
126	WXYZ	NBC	5	Denver	37.05	49.89	15.25	70.74	44.73
127	WXYZ	ABC	5	Denver	34.27	47.67	47.46	50.19	44.65
128	WRGB	NBC	37	Albany-Schenectady-T.	34.27	47.67	47.46	50.19	44.65

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119 WSPD	NBC	45	Toledo.....	35.60	50.80	45.76	54.53	44.45
120 WKRC	ABC	29	Charleston-Huntingto.....	42.45	37.04	47.15	43.97	44.28
121 WKHS	ABC	33	Charleston-Huntingto.....	38.17	41.15	40.24	43.17	44.14
122 KMSP	ABC	13	Minneapolis-St. Paul.....	31.16	34.73	30.74	50.17	43.57
123 WGR	NBC	25	Buffalo.....	16.73	51.45	45.75	61.52	43.77
124 WSAZ	NBC	33	Charleston-Huntingto.....	27.49	66.51	37.29	43.89	43.79
125 WEWS	ABC	7	Cleveland.....	36.22	40.36	30.51	67.80	43.10
126 WHIO	ABC	39	Dayton.....	50.92	46.76	15.25	50.84	43.12
127 WELA	NBC	24	Tampa-St. Petersburg.....	27.29	67.49	15.25	62.45	43.12
128 WREC	ABC	29	Memphis.....	24.90	52.29	40.68	53.82	42.92
129 WSTA	CBS	40	Gaville-Spring-Ashvl.....	22.89	66.55	20.34	51.29	42.67
130 WFLA	CBS	45	San Antonio.....	31.59	58.11	33.90	45.82	42.86
131 WFLC	NBC	33	Columbus.....	33.27	61.26	18.64	53.00	42.32
132 WISN	CBS	31	Madison.....	34.22	53.38	18.64	60.08	42.23
133 WJFK	CBS	3	Dallas.....	25.45	53.81	22.00	47.91	41.93
134 WDAF	NBC	23	Kansas City.....	53.89	62.87	47.89	47.89	41.98
135 KMBC	ABC	23	Kansas City.....	32.47	40.91	32.20	37.93	40.58
136 WTVN	ABC	25	Columbus.....	25.70	42.26	38.98	55.14	40.58
137 WVEC	ABC	44	North-New News-Hamp.....	18.99	40.09	45.76	57.28	40.50
138 WKZO	CBS	31	Kalamazoo-Grand Rapids.....	31.27	55.27	32.20	40.83	30.80
139 WBMG	CBS	38	Birmingham.....	26.37	40.28	44.07	37.89	30.43
140 KOOL	CBS	45	Phoenix.....	34.22	62.00	6.78	52.90	38.97
141 WHBQ	ABC	29	Memphis.....	18.92	38.55	44.07	53.90	38.98
142 KSTV	ABC	32	Denver.....	36.77	43.02	1.69	70.42	37.98
143 KQVH	ABC	17	Atlanta.....	25.22	44.76	23.73	56.86	37.64
144 WCCB	ABC	35	Charlotte.....	21.91	42.35	33.90	45.00	33.84

Network Affiliates Ranked by Composite of All Programming Criteria

Rank	Call letters	Net. aff.	Mkt. No.	Location	Local	News, P.A. and other	Commer.	Financial
39	WNBC	NBC	1	New York City	60	17	88	58
13	WABC	ABC	1	New York City	63	77	49	1
26	WCBS	CBS	2	New York City	75	4	108	27
14	WNBC	NBC	2	Los Angeles	123	3	138	35
102	KABC	ABC	2	Los Angeles	123	115	88	17
40	KNXT	CBS	3	Los Angeles	123	8	121	88
74	WBMM	CBS	3	Chicago	33	18	111	11
43	WMAO	NBC	3	Chicago	41	2	132	74
115	WLS	ABC	3	Chicago	53	61	112	64
50	WPVI	ABC	4	Philadelphia	11	62	112	45
46	KCAU	CBS	4	Philadelphia	42	9	121	73
5	KWTV	NBC	5	Philadelphia	2	7	23	123
62	WWI	NBC	5	Detroit	9	31	129	112
117	WXYZ	ABC	5	Detroit	89	116	182	26
133	WJBK	CBS	6	Detroit	93	99	114	106
17	WNAC	ABC	6	Boston	37	41	54	59
31	WBZ	NBC	6	Boston	15	16	49	188
126	WEWS	ABC	7	Cleveland	42	121	98	98
77	WJW	CBS	7	Cleveland	69	43	101	77
116	WKYC	NBC	7	Cleveland	113	86	121	47
76	KGO	ABC	8	San Francisco	94	70	98	30
1	KPIX	CBS	8	San Francisco	21	13	1	103
8	KTEH	ABC	9	Pittsburgh	52	69	10	15
4	KDKA	ABC	9	Pittsburgh	4	6	20	57
15	WHIC	NBC	9	Pittsburgh	17	53	101	8
7	WMAL	ABC	10	Washington D.C.	28	40	41	9
55	WTOP	CBS	10	Washington D.C.	79	10	117	50
12	WRC	NBC	10	Washington D.C.	47	15	101	7
85	WFAA	ABC	11	Dallas-Fort Worth	14	3	70	85
101	KDFW	CBS	11	Dallas-Fort Worth	35	50	121	111
93	WBAP	NBC	11	Dallas-Fort Worth	132	50	58	115
27	KMOX	CBS	12	St. Louis	59	11	101	42
66	KSD	NBC	12	St. Louis	36	68	70	108
84	KTVI	CBS	12	St. Louis	60	140	24	19
84	WCJO	CBS	13	Minneapolis-St. Paul	12	74	139	72
123	KNBP	ABC	13	Minneapolis-St. Paul	109	141	13	136
59	KSTP	NBC	13	Minneapolis-St. Paul	43	91	57	71
63	WISN	ABC	14	Indianapolis	64	26	129	37
104	WISH	CBS	14	Indianapolis	13	65	78	135
37	WRTV	NBC	15	Indianapolis	64	69	36	64
70	KHOU	CBS	15	Houston	25	30	108	127

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64 KPRC	ABC	15 Houston	13	95	33	100
41 KIRO	CBS	15 Houston	39	22	78	94
114 KIRO	CBS	16 Seattle-Tacoma	66	82	108	125
24 KOMO	CBS	16 Seattle-Tacoma	32	66	57	83
3 KING	NBC	16 Seattle-Tacoma	76	48	6	3
31 WSB	NBC	17 Atlanta	5	56	49	116
143 WQXI	CBS	17 Atlanta	129	136	112	99
60 WAGA	CBS	17 Atlanta	70	5	121	79
66 WTVT	CBS	18 Miami	105	87	33	46
66 WTVT	CBS	18 Miami	71	27	41	117
8 WFLA	NBC	18 Miami	10	1	81	52
48 WFLA	NBC	19 Baltimore	19	33	88	101
2 WJZ	ABC	19 Baltimore	0	39	1	24
34 WMAR	CBS	19 Baltimore	11	12	104	101
25 WLWT	NBC	20 Cincinnati	74	138	133	133
120 WKRC	ABC	20 Cincinnati	40	89	98	89
42 WCPO	CBS	20 Cincinnati	13	92	106	82
74 WIMJ	NBC	21 Milwaukee	97	98	121	121
132 WISN	CBS	21 Milwaukee	71	111	16	41
45 WITI	ABC	21 Milwaukee	68	28	5	110
12 WITI	ABC	22 Hartford-New Haven	81	81	57	124
93 WTNH	ABC	22 Hartford-New Haven	116	23	63	133
103 WHNB	NBC	22 Hartford-New Haven	102	133	88	90
135 KMBC	ABC	23 Kansas City	54	72	144	131
134 WDAF	NBC	23 Kansas City	80	31	117	57
87 WIVT	CBS	23 Kansas City	54	61	117	57
80 WTVT	CBS	24 Tampa-St. Petersburg	120	31	132	78
127 WFLA	NBC	24 Tampa-St. Petersburg	60	43	81	96
71 WLCY	ABC	24 Tampa-St. Petersburg	78	106	16	109
73 WKBW	ABC	25 Buffalo	141	109	41	81
123 WGR	NBC	25 Buffalo	54	21	57	80
38 WBBN	CBS	25 Buffalo	49	96	24	13
10 KGW	NBC	26 Portland	67	35	49	2
21 KOIN	CBS	26 Portland	84	29	57	12
44 KOVR	ABC	27 Sacramento-Stockton	134	120	16	5
105 KXTV	CBS	27 Sacramento-Stockton	127	141	121	66
20 KTRA	NBC	27 Sacramento-Stockton	27	141	121	66
136 WTVN	ABC	28 Columbus	123	130	103	118
131 WLWC	NBC	28 Columbus	99	66	121	118
22 WBS	CBS	28 Columbus	22	19	81	61
141 WHBQ	ABC	29 Memphis	138	130	40	111
89 WMC	NBC	29 Memphis	38	80	114	92
61 WNCN	ABC	30 Nashville	131	108	57	114
88 WLAC	ABC	30 Nashville	82	125	30	22
28 WSM	CBS	30 Nashville	39	101	114	49
11 WNL	NBC	31 New Orleans	24	97	63	16
79 WVUE	ABC	31 New Orleans	107	112	70	31

Network Affiliates Ranked by Composite of All Programming Criteria—Con.

Rank	Call letters	Net. aff.	Mkt. No.	Location	Local	News, P.A. and other	Commer.	Financial
36	WDSU	NBC	31	New Orleans	20	55	81	55
99	KMGH	CBS	32	Denver	44	73	117	98
142	KFTV	NBC	32	Denver	91	128	142	142
113	KOA	NBC	33	Denver	54	79	108	132
124	WSAZ	NBC	33	Charleston-Huntington	119	98	70	139
121	WCHS	CBS	33	Charleston-Huntington	185	132	21	140
110	WFTN	NBC	33	Charleston-Huntington	130	110	41	132
88	WTEV	NBC	34	Providence	114	147	70	82
84	WYAR	NBC	34	Providence	114	94	3	113
57	WMAA	NBC	35	Charlotte	122	75	16	47
144	WSOC	NBC	35	Charlotte	133	120	81	137
82	WBT	CBS	35	Charlotte	46	52	88	120
19	WHAS	CBS	35	Louisville	95	84	33	20
106	WAVE	NBC	36	Louisville	136	142	11	86
92	WLKY	NBC	36	Louisville	136	103	70	39
90	WTEN	CBS	37	Albany-Schenectady-T	135	121	36	124
30	WAST	NBC	37	Albany-Schenectady-T	199	127	16	141
118	WRGB	NBC	38	Birmingham	136	46	49	143
42	WATL	NBC	38	Birmingham	135	117	132	87
129	WBNG	CBS	38	Birmingham	45	123	137	89
126	WLUD	CBS	39	Dayton	30	42	117	121
83	WLWD	NBC	40	Gville-Spring-Ashvl	163	57	13	130
129	WSPA	NBC	40	Gville-Spring-Ashvl	104	63	12	59
72	WFBC	NBC	40	Gville-Spring-Ashvl	113	137	81	144
111	WLOS	NBC	41	Kalamazoo-Gr Rapids	112	45	106	142
35	WZZM	NBC	41	Kalamazoo-Gr Rapids	168	83	70	25
138	WKZO	NBC	41	Kalamazoo-Gr Rapids	168	83	70	25
62	WOTV	NBC	41	Oklaoma City	16	124	81	53
54	KWTY	NBC	41	Oklaoma City	62	124	81	53
51	KOCO	NBC	43	Syracuse	127	89	13	54
108	WHEN	NBC	43	Syracuse	117	127	13	18
47	WYR	NBC	43	Syracuse	144	143	8	18
107	WNYR	NBC	43	Syracuse	144	143	8	18
137	WVEC	NBC	44	North-Newp News-Hamp	137	135	41	95
53	WAVY	NBC	44	North-Newp News-Hamp	130	54	36	84
73	KTVR	NBC	45	Phoenix	8	64	63	77
97	KTVK	NBC	45	Phoenix	88	122	60	144
140	KOOL	CBS	45	Phoenix	88	122	60	144
78	KSAT	NBC	45	San Antonio	80	131	28	38
58	WOAI	NBC	45	San Antonio	58	88	30	93

130 KENS	CBS	45 San Antonio	106	93	81	134
100 WDRH	ABC	45 Toledo	130	144	6	29
119 WSPD	NBC	45 Toledo	123	113	41	107
98 WTOL	CBS	45 Toledo	87	70	63	122
63 WXLV	NBC	46 Gush-High Pt-Win Sal	118	105	28	21
95 KEMV	CBS	46 Gush-High Pt-Win Sal	115	38	5	76
112 KCTV	NBC	46 San Diego	111	102	132	128
109 KCFX	ABC	49 Salt Lake City	142	136	10	42
33 KSL	NBC	50 Salt Lake City	57	90	88	46
53 KUTV	NBC	50 Salt Lake City	83	104	63	11

Network Affiliates Ranked by Total Hours of News, Public Affairs, and "Other" in Composite Week

Rank	Call letters	Net aff.	Mkt. No	Location	News	Rank	Pub. affairs	Rank	Other	Rank	Composite
17 WNBC	NBC	1	1	New York City	15.08	30	11.13	6	11.08	66	37,390
77 WABC	ABC	1	1	New York City	10.58	98	5.37	52	12.42	40	28,367
4 WCRS	CBS	1	1	New York City	16.13	27	4.10	83	21.72	1	41,950
3 KNBC	NBC	2	2	Los Angeles	22.00	1	10.03	9	10.78	70	42,817
115 KABC	ABC	2	2	Los Angeles	9.75	110	4.53	62	8.38	111	22,967
8 KNXT	CBS	2	2	Los Angeles	17.05	10	4.10	84	19.03	5	40,753
12 WBNM	NBC	3	3	Chicago	14.28	40	5.57	48	17.42	9	37,267
61 WLS	ABC	3	3	Chicago	13.58	114	7.25	15	14.09	21	31,053
62 WFL	ABC	3	3	Chicago	9.40	117	9.25	28	12.43	30	30,467
7 WCAU	NBC	4	4	Philadelphia	16.37	25	3.62	98	11.50	3	40,100
31 WWJ	NBC	4	4	Philadelphia	18.55	6	11.43	3	10.83	60	40,817
116 WXYZ	ABC	5	5	Detroit	14.50	42	4.75	66	13.95	22	33,500
99 WJBK	CBS	5	5	Detroit	10.30	103	3.82	93	8.75	104	22,867
41 WNAC	ABC	5	5	Detroit	10.04	107	3.28	110	12.02	50	25,350
10 WBZ	NBC	6	6	Boston	11.43	84	11.17	4	9.38	95	31,983
134 WWS	ABC	6	6	Boston	18.53	7	7.78	10	11.17	64	37,483
134 WWS	ABC	7	7	Cleveland	8.12	128	2.09	137	8.35	112	18,500
134 WWS	ABC	7	7	Cleveland	11.27	51	3.45	104	10.22	18	21,700
98 WKYC	NBC	7	7	Cleveland	11.74	71	4.15	56	10.62	73	21,600
70 KGO	ABC	8	8	San Francisco	10.06	108	11.15	8	7.80	121	35,000
13 KPIX	CBS	8	8	San Francisco	16.62	23	10.72	8	11.37	56	38,700
6 WTAE	ABC	9	9	Pittsburgh	11.82	75	9.63	12	8.75	105	30,200
53 WIC	NBC	9	9	Pittsburgh	20.30	2	7.13	31	13.50	27	40,833
60 WMAL	ABC	10	10	Washington, D.C.	17.55	13	4.53	64	8.40	110	30,783
10 WTOP	NBC	10	10	Washington, D.C.	10.43	101	7.67	20	14.25	30	32,350
11 WRC	ABC	10	10	Washington, D.C.	17.12	17	9.92	10	12.52	38	30,650
114 WFAA	ABC	11	11	Dallas-Fort Worth	14.83	41	9.37	13	13.78	23	37,983
					12.62	60	3.25	112	7.17	131	33,033

Network Affiliates Ranked by Total Hours of News, Public Affairs, and "Other" in Composite Week—Continued

Rank	Call letters	Net aff.	Mkt. No	Location	News	Rank	Pub. affairs	Rank	Other	Rank	Composite
34	KDFW	CBS	11	Dallas-Fort Worth	16.65	22	3.22	113	13.45	28	33.317
50	WBAP	NBC	11	Dallas-Fort Worth	15.92	20	4.70	30	7.90	119	31.033
11	KMOX	NBC	12	St. Louis	16.25	26	4.70	68	18.22	8	38.167
68	KSD	NBC	12	St. Louis	17.47	14	6.05	124	3.98	138	29.500
140	KTVI	AFC	12	St. Louis	6.15	138	2.55	107	6.97	107	17.867
174	KSPD	CBS	13	Minneapolis-St. Paul	18.50	136	1.80	148	15.90	15	15.917
91	KSTP	NBC	13	Minneapolis-St. Paul	18.26	135	2.02	138	7.53	127	27.055
26	WLVI	AFC	14	Indianapolis	14.10	46	5.62	127	6.68	127	27.055
65	WISH	AFC	14	Indianapolis	8.17	127	6.83	32	19.83	34	34.833
30	KRTV	NBC	14	Indianapolis	18.42	127	8.50	136	8.67	108	29.583
30	KHOU	NBC	15	Houston	12.62	70	7.47	22	12.33	43	32.417
95	KTRK	AFC	15	Houston	14.65	44	8.70	16	10.47	83	33.817
22	KPRC	NBC	15	Houston	10.97	91	4.85	61	9.82	80	35.633
93	KIRO	NBC	15	Seattle-Tacoma	15.80	32	7.32	27	12.03	40	33.190
86	KOMO	AFC	16	Seattle-Tacoma	14.23	60	4.40	79	3.15	98	27.783
66	KING	NBC	16	Seattle-Tacoma	12.88	60	4.40	79	3.15	98	27.783
146	KMGH	NBC	17	Atlanta	17.48	15	8.25	32	13.22	40	33.333
60	WXIA	NBC	17	Atlanta	17.48	15	8.25	32	13.22	40	33.333
126	WXII	AFC	17	Atlanta	9.22	130	4.08	80	9.22	97	30.717
5	WAGA	CBS	17	Atlanta	17.72	12	4.97	50	7.22	130	30.517
87	WTVA	CBS	18	Miami	12.65	73	5.07	58	18.92	6	41.600
7	WKLT	NBC	18	Miami	14.37	46	7.38	25	10.23	85	27.350
1	WPLG	AFC	18	Miami	17.90	9	11.12	7	12.08	37	34.433
59	WBAL	NBC	19	Baltimore	14.07	52	4.45	19	16.82	12	45.533
33	WPJZ	AFC	19	Baltimore	11.98	79	11.90	2	14.85	119	33.307
25	WMAR	CBS	19	Baltimore	16.07	40	6.33	83	6.85	133	30.333
118	WLMT	NBC	20	Cincinnati	11.00	40	6.33	83	12.52	28	34.917
138	WCVG	CBS	20	Cincinnati	11.85	183	2.75	100	9.78	111	18.167
92	WCPO	CBS	21	Cincinnati	11.37	88	3.28	111	16.82	14	34.917
92	WCPO	NBC	21	Milwaukee	12.40	68	4.08	87	10.50	80	31.067
98	WISN	CBS	21	Milwaukee	10.23	104	2.80	121	12.35	42	26.983
11	WITI	AFC	21	Milwaukee	9.55	113	3.43	105	10.40	84	23.383
21	WUAB	CBS	21	Milwaukee	13.58	50	5.18	65	16.00	18	34.307
81	WTNH	AFC	22	Hartford-New Haven	8.87	121	12.92	1	6.43	136	28.217
28	WHNB	NBC	22	Hartford-New Haven	15.20	36	6.27	37	13.55	25	35.017
123	KMBC	AFC	23	Kansas City	7.37	131	2.40	101	8.98	101	18.750
72	WDFA	NBC	23	Kansas City	17.75	11	4.18	81	6.88	132	28.717
89	KGVO	CBS	23	Kansas City	11.72	77	6.32	84	11.82	54	33.500
81	WFLA	NBC	24	Tampa-St. Petersburg	16.10	28	2.98	119	11.82	54	33.500
44	WLCY	AFC	24	Tampa-St. Petersburg	8.08	129	7.38	26	16.25	15	31.700
106	WGR	NBC	25	Buffalo	8.75	123	9.67	93	9.67	93	24.353
106	WGR	NBC	25	Buffalo	10.50	100	4.03	70	8.45	109	23.583

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21	WBEN	CBS	25	Buffalo	15.90	30	7.45	23	12.05	48	33.400
22	KATU	ABC	26	Portland	10.85	31	2.83	24	11.83	49	33.377
23	KGW	ABC	27	Portland	16.48	32	3.73	25	11.83	50	33.357
24	KOIN	CBS	28	Sacramento	11.37	33	3.71	26	10.67	51	33.350
25	KOVR	ABC	29	Sacramento-Stockton	11.37	34	3.80	27	10.67	52	32.033
26	KXTV	CBS	30	Sacramento-Stockton	17.22	35	4.07	28	11.40	53	32.033
27	KRA	NBC	31	Sacramento-Stockton	20.15	36	7.07	29	10.57	54	32.033
28	KTVB	NBC	32	Sacramento-Stockton	7.42	37	2.20	30	9.80	55	38.383
29	WLAC	NBC	33	Columbus	9.33	38	9.67	31	10.50	56	19.417
30	WBNS	NBC	34	Memphis	13.60	39	5.60	32	16.87	57	29.500
31	WHBQ	ABC	35	Memphis	6.47	40	2.33	33	8.87	58	36.067
32	WMC	ABC	41	Nashville	15.82	41	6.13	34	7.33	59	17.067
33	WREC	CBS	42	Nashville	11.05	42	4.17	35	8.73	60	28.283
34	WSLX	ABC	43	Nashville	3.35	43	2.05	36	11.53	61	23.050
35	WLAC	CBS	44	New Orleans	10.63	44	4.35	37	11.53	62	23.050
36	WSM	NBC	45	New Orleans	16.77	45	4.35	38	8.17	63	23.050
37	WOL	CBS	46	New Orleans	10.06	46	3.32	39	12.70	64	23.050
38	WYUF	CBS	47	New Orleans	17.12	47	4.53	40	9.10	65	34.967
39	WYUF	CBS	48	New Orleans	11.58	48	4.53	41	9.10	66	23.300
40	WYUF	CBS	49	New Orleans	9.97	49	3.20	42	12.82	67	28.717
41	WYUF	CBS	50	Denver	14.32	50	6.17	43	6.55	68	19.717
42	WYUF	CBS	51	Denver	14.37	51	5.38	44	7.87	69	28.350
43	WYUF	CBS	52	Charleston-Huntington	8.85	52	2.00	45	10.73	70	30.483
44	WYUF	CBS	53	Charleston-Huntington	10.22	53	2.48	46	10.73	71	30.483
45	WYUF	CBS	54	Charleston-Huntington	11.32	54	2.48	47	10.73	72	30.483
46	WYUF	CBS	55	Charleston-Huntington	11.32	55	2.48	48	10.73	73	30.483
47	WYUF	CBS	56	Charleston-Huntington	11.32	56	2.48	49	10.73	74	30.483
48	WYUF	CBS	57	Charleston-Huntington	11.32	57	2.48	50	10.73	75	30.483
49	WYUF	CBS	58	Charleston-Huntington	11.32	58	2.48	51	10.73	76	30.483
50	WYUF	CBS	59	Charleston-Huntington	11.32	59	2.48	52	10.73	77	30.483
51	WYUF	CBS	60	Charleston-Huntington	11.32	60	2.48	53	10.73	78	30.483
52	WYUF	CBS	61	Charleston-Huntington	11.32	61	2.48	54	10.73	79	30.483
53	WYUF	CBS	62	Charleston-Huntington	11.32	62	2.48	55	10.73	80	30.483
54	WYUF	CBS	63	Charleston-Huntington	11.32	63	2.48	56	10.73	81	30.483
55	WYUF	CBS	64	Charleston-Huntington	11.32	64	2.48	57	10.73	82	30.483
56	WYUF	CBS	65	Charleston-Huntington	11.32	65	2.48	58	10.73	83	30.483
57	WYUF	CBS	66	Charleston-Huntington	11.32	66	2.48	59	10.73	84	30.483
58	WYUF	CBS	67	Charleston-Huntington	11.32	67	2.48	60	10.73	85	30.483
59	WYUF	CBS	68	Charleston-Huntington	11.32	68	2.48	61	10.73	86	30.483
60	WYUF	CBS	69	Charleston-Huntington	11.32	69	2.48	62	10.73	87	30.483
61	WYUF	CBS	70	Charleston-Huntington	11.32	70	2.48	63	10.73	88	30.483
62	WYUF	CBS	71	Charleston-Huntington	11.32	71	2.48	64	10.73	89	30.483
63	WYUF	CBS	72	Charleston-Huntington	11.32	72	2.48	65	10.73	90	30.483
64	WYUF	CBS	73	Charleston-Huntington	11.32	73	2.48	66	10.73	91	30.483
65	WYUF	CBS	74	Charleston-Huntington	11.32	74	2.48	67	10.73	92	30.483
66	WYUF	CBS	75	Charleston-Huntington	11.32	75	2.48	68	10.73	93	30.483
67	WYUF	CBS	76	Charleston-Huntington	11.32	76	2.48	69	10.73	94	30.483
68	WYUF	CBS	77	Charleston-Huntington	11.32	77	2.48	70	10.73	95	30.483
69	WYUF	CBS	78	Charleston-Huntington	11.32	78	2.48	71	10.73	96	30.483
70	WYUF	CBS	79	Charleston-Huntington	11.32	79	2.48	72	10.73	97	30.483
71	WYUF	CBS	80	Charleston-Huntington	11.32	80	2.48	73	10.73	98	30.483
72	WYUF	CBS	81	Charleston-Huntington	11.32	81	2.48	74	10.73	99	30.483
73	WYUF	CBS	82	Charleston-Huntington	11.32	82	2.48	75	10.73	100	30.483
74	WYUF	CBS	83	Charleston-Huntington	11.32	83	2.48	76	10.73	101	30.483
75	WYUF	CBS	84	Charleston-Huntington	11.32	84	2.48	77	10.73	102	30.483
76	WYUF	CBS	85	Charleston-Huntington	11.32	85	2.48	78	10.73	103	30.483
77	WYUF	CBS	86	Charleston-Huntington	11.32	86	2.48	79	10.73	104	30.483
78	WYUF	CBS	87	Charleston-Huntington	11.32	87	2.48	80	10.73	105	30.483
79	WYUF	CBS	88	Charleston-Huntington	11.32	88	2.48	81	10.73	106	30.483
80	WYUF	CBS	89	Charleston-Huntington	11.32	89	2.48	82	10.73	107	30.483
81	WYUF	CBS	90	Charleston-Huntington	11.32	90	2.48	83	10.73	108	30.483
82	WYUF	CBS	91	Charleston-Huntington	11.32	91	2.48	84	10.73	109	30.483
83	WYUF	CBS	92	Charleston-Huntington	11.32	92	2.48	85	10.73	110	30.483
84	WYUF	CBS	93	Charleston-Huntington	11.32	93	2.48	86	10.73	111	30.483
85	WYUF	CBS	94	Charleston-Huntington	11.32	94	2.48	87	10.73	112	30.483
86	WYUF	CBS	95	Charleston-Huntington	11.32	95	2.48	88	10.73	113	30.483
87	WYUF	CBS	96	Charleston-Huntington	11.32	96	2.48	89	10.73	114	30.483
88	WYUF	CBS	97	Charleston-Huntington	11.32	97	2.48	90	10.73	115	30.483
89	WYUF	CBS	98	Charleston-Huntington	11.32	98	2.48	91	10.73	116	30.483
90	WYUF	CBS	99	Charleston-Huntington	11.32	99	2.48	92	10.73	117	30.483
91	WYUF	CBS	100	Charleston-Huntington	11.32	100	2.48	93	10.73	118	30.483
92	WYUF	CBS	101	Charleston-Huntington	11.32	101	2.48	94	10.73	119	30.483
93	WYUF	CBS	102	Charleston-Huntington	11.32	102	2.48	95	10.73	120	30.483
94	WYUF	CBS	103	Charleston-Huntington	11.32	103	2.48	96	10.73	121	30.483
95	WYUF	CBS	104	Charleston-Huntington	11.32	104	2.48	97	10.73	122	30.483
96	WYUF	CBS	105	Charleston-Huntington	11.32	105	2.48	98	10.73	123	30.483
97	WYUF	CBS	106	Charleston-Huntington	11.32	106	2.48	99	10.73	124	30.483
98	WYUF	CBS	107	Charleston-Huntington	11.32	107	2.48	100	10.73	125	30.483
99	WYUF	CBS	108	Charleston-Huntington	11.32	108	2.48	101	10.73	126	30.483
100	WYUF	CBS	109	Charleston-Huntington	11.32	109	2.48	102	10.73	127	30.483
101	WYUF	CBS	110	Charleston-Huntington	11.32	110	2.48	103	10.73	128	30.483
102	WYUF	CBS	111	Charleston-Huntington	11.32	111	2.48	104	10.73	129	30.483
103	WYUF	CBS	112	Charleston-Huntington	11.32	112	2.48	105	10.73	130	30.483
104	WYUF	CBS	113	Charleston-Huntington	11.32	113	2.48	106	10.73	131	30.483
105	WYUF	CBS	114	Charleston-Huntington	11.32	114	2.48	107	10.73	132	30.483
106	WYUF	CBS	115	Charleston-Huntington	11.32	115	2.48	108	10.73	133	30.483
107	WYUF	CBS	116	Charleston-Huntington	11.32	116	2.48	109	10.73	134	30.483
108	WYUF	CBS	117	Charleston-Huntington	11.32	117	2.48	110	10.73	135	30.483
109	WYUF	CBS	118	Charleston-Huntington	11.32	118	2.48	111	10.73	136	30.483
110	WYUF	CBS	119	Charleston-Huntington	11.32	119	2.48	112	10.73	137	30.483
111	WYUF	CBS	120	Charleston-Huntington	11.32	120	2.48	113	10.73	138	30.483
112	WYUF	CBS	121	Charleston-Huntington	11.32	121	2.48	114	10.73	139	30.483
113	WYUF	CBS	122	Charleston-Huntington	11.32	122	2.48	115	10.73	140	30.483
114	WYUF	CBS	123	Charleston-Huntington	11.32	123	2.48	116	10.73	141	30.483
115	WYUF	CBS	124	Charleston-Huntington	11.32	124	2.48	117	10.73	142	30.483
116	WYUF	CBS	125	Charleston-Huntington	11.32	125	2.48	118	10.73	143	30.483
117	WYUF	CBS	126	Charleston-Huntington	11.32	126	2.48	119	10.73	144	30.483
118	WYUF	CBS	127	Charleston-Huntington	11.32	127	2.48	120	10.73	145	30.483
119	WYUF	CBS	128	Charleston-Huntington	11.32	128	2.48	121	10.73	146	30.483
120	WYUF	CBS	129	Charleston-Huntington	11.32	129	2.48	122	10.73	147	30.483
121	WYUF	CBS	130	Charleston-Huntington	11.32	130	2.48	123	10.73	148	30.483
122	WYUF	CBS	131	Charleston-Huntington	11.32	131	2.48	124	10.73	149	30.483
123	WYUF	CBS	132	Charleston-Huntington	11.32	132	2.48	125	10.73	150	30.483
124	WYUF	CBS	133	Charleston-Huntington	11.32	133	2.48	126	10.73	151	30.483
125	WYUF	CBS	134	Charleston-Huntington	11.32	134	2.48	127	10.73	152	30.483
126	WYUF	CBS	135	Charleston-Huntington	11.32	135	2.48	128	10.73	153	30.483
127	WYUF	CBS	136	Charleston-Huntington	11.32	136	2.48	129	10.73	154	30.483
128	WYUF	CBS	137	Charleston-Huntington	11.32	137	2.48	130	10.73	155	30.483
129	WYUF	CBS	138	Charleston-Huntington	11.32	138	2.48	131	10.73	156	30.483
130	WYUF	CBS	139	Charleston-Huntington	11.32	139	2.48	132	10.73	157	30.483
131	WYUF	CBS	140	Charleston-Huntington	11.32	140	2.48	133	10.73	158	30.483
132	WYUF	CBS	141	Charleston-Huntington	11.32	141	2.48	134	10.73	159	30.483
133	WYUF	CBS	142	Charleston-Huntington	11.32	142	2.48	135	10.73	160	30.483
134	WYUF	CBS	143	Charleston-Huntington	11.32	143	2.48	136	10.73	161	30.483
135	WYUF	CBS	144	Charleston-Huntington	11.32	144	2.48	137	10.73	162	30.483
136	WYUF	CBS	145	Charleston-Huntington	11.32	145	2.48	138	10.73	1	

Network Affiliates Ranked by Total Hours of News, Public Affairs, and "Other" in Composite Week—Continued

Rank	Call letters	Net aff.	Mkt. No.	Location	News	Rank	Pub. affairs	Rank	Other	Rank	Composite
124	KOCO	ABC	41	Oklahoma City	8.03	131	3.58	99	9.70	92	21,383
80	WHEN	CBS	43	Syracuse	11.37	64	3.73	97	12.17	46	27,397
127	WNYR	NBC	43	Syracuse	9.25	118	3.55	102	7.47	125	27,397
143	WNYC	ABC	43	Syracuse	6.55	135	1.93	140	6.12	143	13,690
136	WVEC	ABC	44	North-New News-Hamp.	10.03	90	2.43	131	5.27	142	18,333
54	WVTV	NBC	44	North-New News-Hamp.	13.50	90	8.15	17	9.10	99	30,750
54	KTAR	NBC	45	Phoenix	17.85	110	6.27	36	5.67	140	29,783
122	KTVB	CBS	45	Phoenix	9.50	115	4.83	129	7.28	129	21,017
76	KOOL	CBS	45	Phoenix	10.33	84	2.62	125	10.57	78	28,417
131	KSAT	ABC	45	San Antonio	10.96	92	3.90	94	4.27	144	19,017
88	WOAI	NBC	45	San Antonio	12.17	87	5.15	33	5.42	141	27,333
93	KENS	CBS	45	San Antonio	12.87	87	0.83	114	10.42	72	26,033
144	WDHO	ABC	45	Toledo	1.67	144	2.50	128	11.49	57	19,000
113	WSPD	NBC	45	Toledo	9.68	111	2.35	133	11.10	31	29,290
71	WTOL	CBS	45	Toledo	13.37	62	4.45	74	13.29	31	29,290
105	WXII	NBC	45	Grub-High Pt-Win-Sal.	10.88	98	3.87	102	15.82	16	32,500
20	KFMB	CBS	45	Grub-High Pt-Win-Sal.	12.82	98	4.22	92	12.08	47	35,567
122	KFMB	NBC	40	San Diego	19.27	6	4.50	80	6.77	134	18,263
126	KUTV	CBS	50	Salt Lake City	6.00	180	4.75	67	7.53	124	27,250
90	KSL	CBS	50	Salt Lake City	10.87	99	3.77	95	12.92	34	27,250
104	KUTV	NBC	50	Salt Lake City	10.82	102	5.98	41	8.12	114	24,417

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Network Affiliates Ranked by Number of Public Service Announcements in Composite Week

Rank	Call letters	Net. aff.	Mkt. No.	Location	PSA's
65	WNBC	NBC	1	New York City.....	207
62	WABC	ABC	1	New York City.....	214
22	WCBS	CBS	1	New York City.....	287
99	KNBC	NBC	2	Los Angeles.....	169
13	KABC	ABC	2	Los Angeles.....	243
85	KNXT	CBS	2	Los Angeles.....	183
53	WBBM	CBS	3	Chicago.....	231
101	WMAQ	NBC	3	Chicago.....	165
87	WLS	ABC	3	Chicago.....	182
10	WPVI	ABC	4	Philadelphia.....	348
38	WCAU	CBS	4	Philadelphia.....	247
3	KYW	NBC	4	Philadelphia.....	464
82	WWJ	NBC	5	Detroit.....	184
141	WXYZ	ABC	5	Detroit.....	81
132	WJBK	CBS	5	Detroit.....	110
23	WNAC	ABC	6	Boston.....	287
17	WBZ	NBC	6	Boston.....	300
124	WEWS	ABC	7	Cleveland.....	127
71	WJW	CBS	7	Cleveland.....	200
88	WKYC	NBC	7	Cleveland.....	179
106	KGO	ABC	8	San Francisco.....	155
14	KPIX	CBS	8	San Francisco.....	317
16	WTAE	ABC	9	Pittsburgh.....	309
9	KDKA	CBS	9	Pittsburgh.....	364
57	WHC	NBC	9	Pittsburgh.....	226
18	WMAL	ABC	10	Washington D.C.....	300
40	WTOP	CBS	10	Washington D.C.....	246
93	WRC	NBC	10	Washington D.C.....	173
67	WFAA	ABC	11	Dallas-Fort Worth.....	204
45	KDFW	CBS	11	Dallas-Fort Worth.....	241
30	WBAP	NBC	11	Dallas-Fort Worth.....	265
49	KMOX	CBS	12	St. Louis.....	237
46	KSD	NBC	12	St. Louis.....	241
197	KTVI	ABC	12	St. Louis.....	86
116	WCCO	CBS	13	Minneapolis-St. Paul.....	147
122	KMSP	ABC	13	Minneapolis-St. Paul.....	130
126	KSTP	NBC	13	Minneapolis-St. Paul.....	124
50	WLWI	ABC	14	Indianapolis.....	235
68	WISH	CBS	14	Indianapolis.....	204
89	WRTV	NBC	14	Indianapolis.....	179
60	KHOU	CBS	15	Houston.....	218
102	KTRK	ABC	15	Houston.....	165
12	KPRC	NBC	15	Houston.....	327
140	KIRO	CBS	16	Seattle-Tacoma.....	83
25	KOMO	ABC	16	Seattle-Tacoma.....	285
133	KING	NBC	16	Seattle-Tacoma.....	109
78	WSB	NBC	17	Atlanta.....	191
44	WXIA	ABC	17	Atlanta.....	242
100	WAGA	CBS	17	Atlanta.....	166
113	WTVJ	CBS	18	Miami.....	149
47	WCKT	NBC	18	Miami.....	241
56	WPLG	ABC	18	Miami.....	226
21	WBAL	NBC	19	Baltimore.....	290
2	WJZ	ABC	19	Baltimore.....	405
41	WMAR	CBS	19	Baltimore.....	245
36	WLWT	NBC	20	Cincinnati.....	256
42	WKRC	ABC	20	Cincinnati.....	245
127	WCPO	CBS	20	Cincinnati.....	121
135	WTMJ	NBC	21	Milwaukee.....	103
58	WISN	CBS	21	Milwaukee.....	224
120	WITI	ABC	21	Milwaukee.....	133
13	WTIC	CBS	22	Hartford-New Haven.....	326
28	WTNH	ABC	22	Hartford-New Haven.....	270
144	WHNB	NBC	22	Hartford-New Haven.....	0
97	KMBC	ABC	23	Kansas City.....	172
81	WDAF	NBC	23	Kansas City.....	185
100	KCMO	CBS	23	Kansas City.....	151
6	WTVT	CBS	24	Tampa-St. Petersburg.....	386
54	WFLA	NBC	24	Tampa-St. Petersburg.....	230
4	WLCY	ABC	24	Tampa-St. Petersburg.....	462
31	WKBW	ABC	25	Buffalo.....	263
69	WGR	NBC	25	Buffalo.....	203
35	WBFN	CBS	25	Buffalo.....	258
55	KATU	ABC	26	Portland.....	230
32	KGW	NBC	26	Portland.....	62
5	KOIN	CBS	26	Portland.....	446
98	KOVR	ABC	27	Sacramento-Stockton.....	172
74	KXTV	CBS	27	Sacramento-Stockton.....	195
77	KORA	NBC	27	Sacramento-Stockton.....	192

Network Affiliates Ranked by Number of Public Service Announcements in Composite Week—Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	P&A's
76	WTVN	ABC	28	Columbus.....	194
91	WLWC	NBC	28	Columbus.....	177
15	WBNS	CBS	28	Columbus.....	317
134	WMC	NBC	29	Memphis.....	107
80	WNCB	NBC	29	Memphis.....	112
131	WREC	CBS	29	Memphis.....	186
135	WSIX	ABC	30	Nashville.....	84
136	WLAC	CBS	30	Nashville.....	82
142	WSM	NBC	30	Nashville.....	75
95	WWL	CBS	31	New Orleans.....	176
72	WVUE	ABC	31	New Orleans.....	198
136	WDSU	NBC	31	New Orleans.....	98
51	KMGH	CBS	32	Denver.....	234
123	KBTv	ABC	32	Denver.....	129
61	KOA	NBC	32	Denver.....	216
92	KBZ	NBC	33	Charleston-Huntington.....	177
77	WCBS	NBC	33	Charleston-Huntington.....	203
50	WHTN	ABC	33	Charleston-Huntington.....	221
43	WTEV	ABC	34	Providence.....	259
7	WJAR	NBC	34	Providence.....	309
105	WPRI	CBS	34	Providence.....	159
110	WBOC	NBC	35	Charlotte.....	151
114	WCCB	ABC	35	Charlotte.....	140
63	WBIV	CBS	35	Charlotte.....	212
66	WHAS	CBS	36	Louisville.....	307
54	WAVE	NBC	36	Louisville.....	184
130	WLKY	ABC	36	Louisville.....	112
62	WBNS	NBC	37	Albany-Schenectady-T.....	31
68	WAST	ABC	37	Albany-Schenectady-T.....	238
26	WRGB	NBC	37	Albany-Schenectady-T.....	281
19	WAPI	NBC	38	Birmingham.....	300
82	WBRC	ABC	38	Birmingham.....	185
119	WBMG	CBS	38	Birmingham.....	134
143	WHTO	CBS	39	Dayton.....	60
79	WLWD	NBC	39	Dayton.....	188
104	WSPA	CBS	40	Gvnlle-Sptng-Ashvl.....	162
86	WFBC	NBC	40	Gvnlle-Sptng-Ashvl.....	183
125	WLAX	ABC	41	Kalamazoo-Gr Rapids.....	256
94	WZZM	ABC	41	Kalamazoo-Gr Rapids.....	141
129	WZOZ	CBS	41	Kalamazoo-Gr Rapids.....	195
75	WOTV	NBC	41	Kalamazoo-Gr Rapids.....	195
8	KWTV	CBS	41	Oklahoma City.....	365
1	WKY	NBC	41	Oklahoma City.....	572
34	KOCO	ABC	41	Oklahoma City.....	259
115	WHEN	CBS	43	Syracuse.....	148
27	WSYR	NBC	43	Syracuse.....	172
73	WNYB	ABC	43	Syracuse.....	297
93	WVEC	ABC	44	Nor-Newp News-Hamp.....	177
20	WVY	NBC	44	Nor-Newp News-Hamp.....	177
107	KTAR	NBC	45	Phoenix.....	179
111	KTVK	ABC	45	Phoenix.....	150
11	KOOL	CBS	45	Phoenix.....	326
128	KSAT	ABC	45	San Antonio.....	115
39	WOAI	NBC	45	San Antonio.....	247
64	KENS	CBS	45	San Antonio.....	211
117	WDHO	ABC	45	Toledo.....	146
108	WSPD	NBC	45	Toledo.....	154
103	WTOL	CBS	45	Toledo.....	168
112	WXII	NBC	46	Gnab-Hgh Pt-Win Sal.....	149
94	WMY	CBS	46	Gnab-Hgh Pt-Win Sal.....	251
37	KFMB	CBS	49	San Diego.....	177
121	KGTv	NBC	49	San Diego.....	182
29	KGPX	ABC	50	Salt Lake City.....	209
118	KSL	CBS	50	Salt Lake City.....	135
107	KUTV	NBC	50	Salt Lake City.....	135

Network Affiliates Ranked by Number of Composite Week Hours With More Than 12 Min of Commercials

Rank	Call letters	Net. aff.	Mkt. No.	Location	12-16 min	Over 16	Total
96	WNBC	NBC	1	New York City.....	40	0	40
54	WABC	ABC	1	New York City.....	33	0	33
109	WCBS	CBS	1	New York City.....	44	0	44
138	KNBC	NBC	2	Los Angeles.....	52	0	52
97	KABC	ABC	2	Los Angeles.....	30	1	30
125	KNXT	CBS	2	Los Angeles.....	48	0	48
42	F.C.C.	2d					

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Network Affiliates Ranked by Number of Public Service Announcements in Composite Week—Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	12-16 min	Over 16	Total
141	WBBM	CBS	3	Chicago.....	56	0	56
134	WMAQ	NBC	3	Chicago.....	50	0	50
143	WLS	ABC	3	Chicago.....	55	3	58
113	WPVI	ABC	4	Philadelphia.....	44	1	46
124	WCAU	CBS	4	Philadelphia.....	48	0	48
23	KYW	NBC	4	Philadelphia.....	26	0	25
129	WWJ	NBC	5	Detroit.....	49	0	49
133	WXYZ	ABC	5	Detroit.....	50	0	50
115	WJBK	CBS	5	Detroit.....	45	1	46
26	WNAC	ABC	6	Boston.....	26	1	27
53	WBZ	NBC	6	Boston.....	33	0	33
98	WBWS	ABC	7	Cleveland.....	41	0	41
103	WJW	CBS	7	Cleveland.....	42	0	42
123	WKYC	NBC	7	Cleveland.....	48	0	48
100	KGO	ABC	8	San Francisco.....	40	1	41
1	KPLX	CBS	8	San Francisco.....	2	0	2
10	WTAE	ABC	9	Pittsburgh.....	20	0	20
30	KDKA	CBS	9	Pittsburgh.....	29	0	29
105	WTIC	NBC	9	Pittsburgh.....	41	1	42
44	WMAL	ABC	10	Washington D.C.....	32	0	32
120	WTOP	CBS	10	Washington D.C.....	46	1	47
102	WRC	NBC	10	Washington D.C.....	42	0	42
76	WFAA	ABC	11	Dallas-Fort Worth.....	36	1	37
122	KOFW	CBS	11	Dallas-Fort Worth.....	48	0	48
39	WBAP	NBC	11	Dallas-Fort Worth.....	20	1	21
104	KMOX	CBS	12	St. Louis.....	42	0	42
75	KSD	NBC	12	St. Louis.....	36	1	37
25	KTVI	ABC	12	St. Louis.....	27	0	27
130	WCCO	CBS	13	Minneapolis-St. Paul.....	51	2	53
15	KMSP	ABC	13	Minneapolis-St. Paul.....	24	0	24
61	KSTP	NBC	13	Minneapolis-St. Paul.....	35	0	35
130	WLWI	ABC	14	Indianapolis.....	48	1	49
79	WISH	CBS	14	Indianapolis.....	38	1	39
38	WRTV	NBC	14	Indianapolis.....	31	1	32
110	KHOU	CBS	15	Houston.....	43	1	44
68	KIRK	ABC	15	Houston.....	36	0	36
80	KPRC	NBC	15	Houston.....	36	2	38
106	KIRO	CBS	16	Seattle-Tacoma.....	44	0	44
60	KOMO	ABC	16	Seattle-Tacoma.....	35	0	35
6	KING	NBC	16	Seattle-Tacoma.....	18	0	18
52	WSB	NBC	17	Atlanta.....	33	0	33
112	WQXI	ABC	17	Atlanta.....	45	0	45
121	WAGA	CBS	17	Atlanta.....	48	0	48
34	WTVJ	CBS	18	Miami.....	30	0	30
48	WCKT	NBC	18	Miami.....	31	1	32
56	WPLG	ABC	18	Miami.....	38	1	39
95	WBAL	NBC	19	Baltimore.....	40	0	40
4	WJZ	ABC	19	Baltimore.....	13	0	13
78	WMAR	CBS	19	Baltimore.....	38	0	38
131	WLWT	NBC	20	Cincinnati.....	46	3	49
33	WKRC	ABC	20	Cincinnati.....	30	0	30
90	WCPO	CBS	20	Cincinnati.....	40	1	41
107	WTMJ	NBC	21	Milwaukee.....	43	0	43
128	WISN	CBS	21	Milwaukee.....	46	2	48
21	WITI	ABC	21	Milwaukee.....	25	0	25
5	WTIC	CBS	22	Hartford-New Haven.....	15	0	15
57	WINH	ABC	22	Hartford-New Haven.....	35	0	35
64	WHNB	NBC	22	Hartford-New Haven.....	36	0	36
94	KMBC	ABC	23	Kansas City.....	40	0	40
144	WDAF	NBC	23	Kansas City.....	49	10	59
101	KCMD	CBS	23	Kansas City.....	42	0	42
118	WTVT	CBS	24	Tampa-St. Petersburg.....	47	0	47
132	WFLA	NBC	24	Tampa-St. Petersburg.....	50	0	50
87	WLCY	ABC	24	Tampa-St. Petersburg.....	37	2	39
20	WKBW	ABC	25	Buffalo.....	25	0	25
43	WGR	NBC	25	Buffalo.....	35	0	35
50	WBEN	CBS	25	Buffalo.....	35	0	35
24	KATU	ABC	26	Portland.....	27	0	27
51	KGW	NBC	26	Portland.....	33	0	33
62	KOIN	CBS	26	Portland.....	33	2	35
19	KDVR	ABC	27	Sacramento-Stockton.....	25	0	25
127	KXTV	CBS	27	Sacramento-Stockton.....	47	1	48
77	KCRA	NBC	27	Sacramento-Stockton.....	35	2	37
69	WTVN	ABC	28	Columbus.....	35	1	36
126	WLWC	NBC	28	Columbus.....	47	1	48
85	WBNS	CBS	28	Columbus.....	39	0	39
50	WHBQ	ABC	29	Memphis.....	33	0	33
114	WMC	NBC	29	Memphis.....	45	1	46
58	WREC	CBS	30	Memphis.....	35	0	35
31	WSIX	ABC	30	Nashville.....	28	1	29
116	WLAC	CBS	30	Nashville.....	44	2	46
67	WSM	NBC	30	Nashville.....	36	0	36

Network Affiliates Ranked by Number of Composite Week Hours With More Than 12 Min of Commercials—Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	12-16 min	Over 16	Total
72	WWL	CBS	31	New Orleans.....	37	0	37
47	WVUE	ABC	31	New Orleans.....	31	1	32
82	WDSU	NBC	31	New Orleans.....	30	0	30
117	KMGH	CBS	32	Denver.....	47	0	47
142	KSTV	ABC	32	Denver.....	57	1	58
111	KDA	NBC	32	Denver.....	42	2	44
71	WSAZ	NBC	33	Charleston-Huntington.....	37	0	37
27	WCHS	CBS	33	Charleston-Huntington.....	24	3	27
18	WHTN	ABC	33	Charleston-Huntington.....	25	0	25
45	WTEV	ABC	34	Providence.....	32	0	32
70	WJAR	NBC	34	Providence.....	37	0	37
3	WPRI	CBS	34	Providence.....	10	1	11
17	WSOC	NBC	35	Charlotte.....	25	0	25
84	WCCB	ABC	35	Charlotte.....	30	0	30
93	WBT	CBS	35	Charlotte.....	40	0	40
35	WHAS	CBS	36	Louisville.....	29	1	30
92	WAVE	ABC	36	Louisville.....	40	0	40
14	WLKY	ABC	36	Louisville.....	21	1	22
73	WTEN	CBS	37	Albany-Schenectady-Troy.....	37	0	37
9	WAST	ABC	37	Albany-Schenectady-Troy.....	18	1	19
37	WRGB	NBC	37	Albany-Schenectady-Troy.....	31	0	31
22	WAPI	NBC	38	Birmingham.....	24	1	25
56	WBRC	ABC	38	Birmingham.....	29	4	33
55	WBMG	CBS	38	Birmingham.....	31	2	33
135	WHIO	CBS	39	Dayton.....	48	2	50
137	WLWD	NBC	39	Dayton.....	49	2	51
119	WSPA	CBS	40	Gainesville-Spartanburg-Asheville.....	46	1	47
14	WFBC	NBC	40	Gainesville-Spartanburg-Asheville.....	24	0	24
12	WLOS	ABC	40	Gainesville-Spartanburg-Asheville.....	23	0	23
46	WZZM	ABC	41	Kalamazoo-Grand Rapids.....	31	1	32
91	WKZO	CBS	41	Kalamazoo-Grand Rapids.....	40	0	40
106	WOTV	NBC	41	Kalamazoo-Grand Rapids.....	43	0	43
74	KWTV	CBS	41	Oklahoma City.....	37	0	37
40	WKY	NBC	41	Oklahoma City.....	29	2	31
81	KOCO	ABC	41	Oklahoma City.....	30	0	30
40	WHEN	CBS	43	Syracuse.....	40	0	40
13	WSYR	NBC	43	Syracuse.....	24	0	24
8	WNY	ABC	43	Syracuse.....	19	0	19
42	WVEC	ABC	44	Norfolk-Newp News-Hamp.....	32	0	32
36	WAVY	NBC	44	Norfolk-Newp News-Hamp.....	31	0	31
66	KTAR	NBC	45	Phoenix.....	36	0	36
49	KTVK	ABC	45	Phoenix.....	33	0	33
140	KOOL	CBS	45	Phoenix.....	55	0	55
28	KSAT	ABC	45	San Antonio.....	28	0	28
32	WOAI	NBC	45	San Antonio.....	27	2	29
83	KENS	CBS	45	San Antonio.....	30	0	30
7	WDHO	ABC	45	Toledo.....	18	0	18
41	WSPD	NBC	45	Toledo.....	32	0	32
65	WTOL	CBS	45	Toledo.....	36	0	36
29	WXII	NBC	48	Gnsb-High Pt-Win-Sal.....	28	0	28
2	WFMY	CBS	48	Gnsb-High Pt-Win-Sal.....	4	0	4
135	KFMB	CBS	49	San Diego.....	47	3	50
89	KGT	NBC	49	San Diego.....	40	0	40
16	KCPX	ABC	50	Salt Lake City.....	25	0	25
88	KSL	CBS	50	Salt Lake City.....	40	0	40
63	KUTV	NBC	50	Salt Lake City.....	36	0	36

Network Affiliates Ranked by Local Programming

Rank	Call letters	Net. aff.	Mkt. No.	Location	Prime time local and rank	Local programming and rank	Composite rank
60	WNBC	NBC		New York City	6.00	46	9,833
61	WABC	ABC		New York City	3.50	64	9,500
62	WBNS	CBS		New York City	3.50	29	8,789
63	KNBC	NBC		Los Angeles	8.00	7	14,958
64	KNBC	ABC		Los Angeles	1.00	130	6,553
65	KNBC	CBS		Los Angeles	1.00	30	12,529
66	KNBC	NBC		Los Angeles	1.00	11	11,558
67	KNBC	CBS		Los Angeles	1.00	11	11,558
68	KNBC	NBC		Los Angeles	1.00	11	11,558
69	KNBC	CBS		Los Angeles	1.00	11	11,558
70	KNBC	NBC		Los Angeles	1.00	11	11,558
71	KNBC	CBS		Los Angeles	1.00	11	11,558
72	KNBC	NBC		Los Angeles	1.00	11	11,558
73	KNBC	CBS		Los Angeles	1.00	11	11,558
74	KNBC	NBC		Los Angeles	1.00	11	11,558
75	KNBC	CBS		Los Angeles	1.00	11	11,558
76	KNBC	NBC		Los Angeles	1.00	11	11,558
77	KNBC	CBS		Los Angeles	1.00	11	11,558
78	KNBC	NBC		Los Angeles	1.00	11	11,558
79	KNBC	CBS		Los Angeles	1.00	11	11,558
80	KNBC	NBC		Los Angeles	1.00	11	11,558
81	KNBC	CBS		Los Angeles	1.00	11	11,558
82	KNBC	NBC		Los Angeles	1.00	11	11,558
83	KNBC	CBS		Los Angeles	1.00	11	11,558
84	KNBC	NBC		Los Angeles	1.00	11	11,558
85	KNBC	CBS		Los Angeles	1.00	11	11,558
86	KNBC	NBC		Los Angeles	1.00	11	11,558
87	KNBC	CBS		Los Angeles	1.00	11	11,558
88	KNBC	NBC		Los Angeles	1.00	11	11,558
89	KNBC	CBS		Los Angeles	1.00	11	11,558
90	KNBC	NBC		Los Angeles	1.00	11	11,558
91	KNBC	CBS		Los Angeles	1.00	11	11,558
92	KNBC	NBC		Los Angeles	1.00	11	11,558
93	KNBC	CBS		Los Angeles	1.00	11	11,558
94	KNBC	NBC		Los Angeles	1.00	11	11,558
95	KNBC	CBS		Los Angeles	1.00	11	11,558
96	KNBC	NBC		Los Angeles	1.00	11	11,558
97	KNBC	CBS		Los Angeles	1.00	11	11,558
98	KNBC	NBC		Los Angeles	1.00	11	11,558
99	KNBC	CBS		Los Angeles	1.00	11	11,558
100	KNBC	NBC		Los Angeles	1.00	11	11,558
101	KNBC	CBS		Los Angeles	1.00	11	11,558
102	KNBC	NBC		Los Angeles	1.00	11	11,558
103	KNBC	CBS		Los Angeles	1.00	11	11,558
104	KNBC	NBC		Los Angeles	1.00	11	11,558
105	KNBC	CBS		Los Angeles	1.00	11	11,558
106	KNBC	NBC		Los Angeles	1.00	11	11,558
107	KNBC	CBS		Los Angeles	1.00	11	11,558
108	KNBC	NBC		Los Angeles	1.00	11	11,558
109	KNBC	CBS		Los Angeles	1.00	11	11,558
110	KNBC	NBC		Los Angeles	1.00	11	11,558
111	KNBC	CBS		Los Angeles	1.00	11	11,558
112	KNBC	NBC		Los Angeles	1.00	11	11,558
113	KNBC	CBS		Los Angeles	1.00	11	11,558
114	KNBC	NBC		Los Angeles	1.00	11	11,558
115	KNBC	CBS		Los Angeles	1.00	11	11,558
116	KNBC	NBC		Los Angeles	1.00	11	11,558
117	KNBC	CBS		Los Angeles	1.00	11	11,558
118	KNBC	NBC		Los Angeles	1.00	11	11,558
119	KNBC	CBS		Los Angeles	1.00	11	11,558
120	KNBC	NBC		Los Angeles	1.00	11	11,558
121	KNBC	CBS		Los Angeles	1.00	11	11,558
122	KNBC	NBC		Los Angeles	1.00	11	11,558
123	KNBC	CBS		Los Angeles	1.00	11	11,558
124	KNBC	NBC		Los Angeles	1.00	11	11,558
125	KNBC	CBS		Los Angeles	1.00	11	11,558
126	KNBC	NBC		Los Angeles	1.00	11	11,558
127	KNBC	CBS		Los Angeles	1.00	11	11,558
128	KNBC	NBC		Los Angeles	1.00	11	11,558
129	KNBC	CBS		Los Angeles	1.00	11	11,558
130	KNBC	NBC		Los Angeles	1.00	11	11,558
131	KNBC	CBS		Los Angeles	1.00	11	11,558
132	KNBC	NBC		Los Angeles	1.00	11	11,558
133	KNBC	CBS		Los Angeles	1.00	11	11,558
134	KNBC	NBC		Los Angeles	1.00	11	11,558
135	KNBC	CBS		Los Angeles	1.00	11	11,558
136	KNBC	NBC		Los Angeles	1.00	11	11,558
137	KNBC	CBS		Los Angeles	1.00	11	11,558
138	KNBC	NBC		Los Angeles	1.00	11	11,558
139	KNBC	CBS		Los Angeles	1.00	11	11,558
140	KNBC	NBC		Los Angeles	1.00	11	11,558
141	KNBC	CBS		Los Angeles	1.00	11	11,558
142	KNBC	NBC		Los Angeles	1.00	11	11,558
143	KNBC	CBS		Los Angeles	1.00	11	11,558
144	KNBC	NBC		Los Angeles	1.00	11	11,558
145	KNBC	CBS		Los Angeles	1.00	11	11,558

Network Affiliates Ranked by Local Programming—Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	Prime time local and rank	Local programming and rank	Composite
29	KPRC	NBC	15	Houston	7.52	14	11.725
30	KIRO	CBS	16	Seattle-Tacoma	8.83	85	9.875
32	KOMO	ABC	16	Seattle-Tacoma	8.00	51	9.875
76	KING	NBC	100	Seattle-Tacoma	8.40	100	11.452
5	WSB	NBC	8	Atlanta	8.40	8	8.750
129	WQXI	ABC	0.0	Atlanta	8.35	146	14.208
70	WAGA	CBS	6.35	Atlanta	8.35	10.52	8.775
105	WTVI	CBS	4.02	Miami	8.35	11.87	8.700
71	WCKT	NBC	5.50	Miami	8.35	79	8.688
10	WFLG	ABC	4.53	Miami	8.35	112	8.688
10	WFLA	ABC	7.80	Baltimore	8.35	77	13.275
6	WMAR	CBS	7.80	Baltimore	8.35	31	13.275
11	WLWT	NBC	8.53	Baltimore	8.35	10	13.550
74	WKRC	ABC	7.42	Chicago	8.35	16	13.962
40	WCFO	CBS	6.17	Chicago	8.35	10	13.962
13	WTMJ	NBC	2.17	Chicago	8.35	14	13.962
97	WISN	CBS	4.00	Chicago	8.35	57	20.917
21	Milwaukee	CBS	8.00	Chicago	8.35	25	8.858
21	Milwaukee	CBS	4.77	Chicago	8.35	108	10.875
21	Milwaukee	CBS	6.50	Chicago	8.35	184	12.175
22	Hartford-New Haven	CBS	5.10	Chicago	8.35	73	8.958
22	Hartford-New Haven	CBS	3.08	Chicago	8.35	60	9.150
22	Hartford-New Haven	CBS	3.33	Chicago	8.35	107	8.258
23	Kansas City	NBC	6.00	Chicago	8.35	102	6.000
23	Kansas City	NBC	7.50	Chicago	8.35	136	6.792
23	Kansas City	NBC	8.35	Chicago	8.35	36	11.475
24	Tampa-St. Petersburg	CBS	3.40	Chicago	8.35	76	10.042
24	Tampa-St. Petersburg	CBS	1.83	Chicago	8.35	90	8.525
24	Tampa-St. Petersburg	CBS	3.40	Chicago	8.35	123	8.708
25	Buffalo	ABC	3.50	Chicago	8.35	127	9.853
25	Buffalo	ABC	2.50	Chicago	8.35	102	8.688
25	Buffalo	ABC	3.50	Chicago	8.35	143	8.508
25	Buffalo	ABC	3.50	Chicago	8.35	35	10.042

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50 KATU	ABC	26 Portland	73	15.95	41	10.458
67 KGW	NBC	26 Portland	111	15.42	49	9.208
84 KOIN	CBS	26 Portland	84	12.13	78	8.017
134 KOVR	CBS	26 Portland	120	6.17	141	4.417
191 KCRN	CBS	27 Sacramento-Stockton	60	8.83	124	8.977
128 KTVN	ABC	27 Sacramento-Stockton	17	10.27	88	11.833
99 WLCG	NBC	28 Columbus	141	10.75	131	5.375
22 WENS	CBS	28 Columbus	25	18.47	138	6.958
138 WHBQ	ABC	28 Columbus	142	18.33	15	12.500
131 WREC	NBC	29 Memphis	22	7.92	129	3.958
82 WSIX	ABC	29 Memphis	121	15.47	48	11.233
39 WLAC	CBS	29 Memphis	77	7.75	133	5.308
24 WSM	NBC	30 Nashville	23	11.82	82	8.187
107 WUUE	ABC	30 Nashville	23	15.00	66	10.958
20 WDSU	CBS	30 Nashville	20	17.00	26	12.308
44 KMOH	ABC	31 New Orleans	1	17.92	21	12.750
91 KBTU	NBC	31 New Orleans	65	7.93	138	6.583
119 WSAZ	NBC	32 Denver	35	17.88	28	12.543
85 WCHS	CBS	32 Denver	36	17.07	84	10.667
140 WHTN	ABC	32 Denver	47	10.17	101	7.692
127 WTEV	ABC	33 Charleston-Huntington	75	15.42	60	10.042
114 WTKR	CBS	33 Charleston-Huntington	86	7.47	135	5.750
122 WSOC	CBS	33 Charleston-Huntington	124	13.47	70	7.983
123 WCB	NBC	34 Providence	136	7.00	139	3.760
46 WTV	CBS	34 Providence	94	10.00	105	5.290
35 WLAS	CBS	34 Providence	95	8.83	117	6.197
35 WAVE	NBC	35 Charlotte	112	8.07	121	6.083
135 WLKY	ABC	35 Charlotte	125	8.33	125	5.875
110 WTEN	CBS	36 Louisville	121	15.33	126	4.883
135 WAST	ABC	36 Louisville	125	17.35	126	10.617
100 WRGB	NBC	37 Albany-Schenectady-T	113	11.82	20	11.486
		37 Albany-Schenectady-T	143	8.75	85	7.398
		37 Albany-Schenectady-T	109	13.00	120	4.375
		37 Albany-Schenectady-T	128	7.23	104	6.500
		37 Albany-Schenectady-T	96	10.42	138	4.468
		37 Albany-Schenectady-T			95	6.958

Network Affiliates Ranked by Local Programming—Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	Prime time local and rank	Local programing and rank	Composite rank
126	WAPI	NBC	38	Birmingham	2.50	8.50	5.500
127	WBRC	ABC	38	Birmingham	5.23	19.62	12.425
128	WBNG	CBS	38	Birmingham	3.20	7.53	12.425
129	WBTH	CBS	38	Birmingham	5.50	15.20	10.650
130	WSPD	NBC	39	Dayton	5.50	17.53	11.667
131	WSPN	NBC	40	Dayton	3.20	10.25	6.775
132	WSPN	NBC	40	Dayton	3.00	10.42	6.708
133	WLOS	ABC	40	Greenville-Spartanburg	0.75	6.53	3.267
134	WLOS	ABC	40	Greenville-Spartanburg	3.00	12.00	6.375
135	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
136	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
137	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
138	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
139	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
140	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
141	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
142	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
143	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
144	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
145	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
146	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
147	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
148	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
149	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
150	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
151	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
152	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
153	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
154	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
155	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
156	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
157	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
158	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
159	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
160	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
161	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
162	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
163	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
164	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
165	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
166	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
167	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
168	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
169	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
170	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
171	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
172	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
173	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
174	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
175	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
176	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
177	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
178	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
179	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
180	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
181	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
182	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
183	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
184	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
185	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
186	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
187	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
188	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
189	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
190	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
191	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
192	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
193	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
194	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
195	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
196	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
197	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
198	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
199	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312
200	WZLW	ABC	41	Kalamazoo-Gr Rapids	3.00	13.18	10.312

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Network affiliates ranked by the ratio of program expenses/gross revenues

Rank	Call letters	Net. aff.	Mkt. No.	Location
58	WNBC	NBC	1	New York City
1	WABC	ABC	1	New York City
27	WCBS	CBS	1	New York City
35	KNBC	NBC	2	Los Angeles
17	KABC	ABC	2	Los Angeles
88	KNXT	CBS	2	Los Angeles
65	WBBM	CBS	3	Chicago
74	WMAQ	NBC	3	Chicago
68	WLS	ABC	3	Chicago
45	WPTI	ABC	4	Philadelphia
73	WCAU	CBS	4	Philadelphia
123	KYW	NBC	4	Philadelphia
112	WWJ	NBC	5	Detroit
26	WXYZ	ABC	5	Detroit
106	WJBK	CBS	5	Detroit
59	WNAC	ABC	6	Boston
138	WBZ	NBC	6	Boston
56	WEWS	ABC	7	Cleveland
77	WJW	CBS	7	Cleveland
43	WKYC	NBC	7	Cleveland
30	KGO	ABC	8	San Francisco
103	KPIX	CBS	8	San Francisco
15	WTAE	ABC	9	Pittsburgh
57	KDKA	CBS	9	Pittsburgh
8	WHIC	NBC	9	Pittsburgh
9	WMAL	ABC	10	Washington, D.C.
50	WTOP	CBS	10	Washington, D.C.
7	WRC	NBC	10	Washington, D.C.
85	WFAA	ABC	11	Dallas-Fort Worth
141	KDFW	CBS	11	Dallas-Fort Worth
115	WBAP	NBC	11	Dallas-Fort Worth
36	KMOX	CBS	12	St. Louis
108	KSD	NBC	12	St. Louis
19	KTVI	ABC	12	St. Louis
72	WCCO	CBS	13	Minneapolis-St. Paul
126	KMSP	ABC	13	Minneapolis-St. Paul
71	KSTP	NBC	13	Minneapolis-St. Paul
37	WLWI	ABC	14	Indianapolis
135	WISH	CBS	14	Indianapolis
64	WRTV	NBC	14	Indianapolis
127	KHOU	CBS	15	Houston
100	KTRK	ABC	15	Houston
94	KPRC	NBC	15	Houston
125	KIRO	CBS	16	Seattle-Tacoma
28	KOMO	ABC	16	Seattle-Tacoma
3	KING	NBC	16	Seattle-Tacoma
116	WSB	NBC	17	Atlanta
99	WQXI	ABC	17	Atlanta
79	WAGA	CBS	17	Atlanta
46	WTVJ	CBS	18	Miami
117	WCKT	NBC	18	Miami
52	WFLG	ABC	18	Miami
101	WBAL	NBC	19	Baltimore
24	WTZ	ABC	19	Baltimore
104	WMAR	CBS	19	Baltimore
44	WLWT	NBC	20	Cincinnati
133	WKRC	ABC	20	Cincinnati
33	WCPO	CBS	20	Cincinnati
89	WTMJ	NBC	21	Milwaukee
82	WISN	CBS	21	Milwaukee
41	WITI	ABC	21	Milwaukee
110	WTIC	CBS	22	Hartford-New Haven
124	WTNH	ABC	22	Hartford-New Haven
136	WHNB	NBC	22	Hartford-New Haven
90	KMBC	ABC	23	Kansas City
131	WDAF	NBC	23	Kansas City
97	KCMO	CBS	23	Kansas City
51	WTVT	CBS	24	Tampa-St. Petersburg
78	WFLA	NBC	24	Tampa-St. Petersburg
96	WLCY	ABC	24	Tampa-St. Petersburg
104	WKBW	ABC	25	Buffalo
81	WGR	NBC	25	Buffalo
80	WBEN	CBS	25	Buffalo
13	KATU	ABC	26	Portland
2	KGW	NBC	26	Portland
12	KOIN	CBS	26	Portland
5	KOVR	ABC	27	Sacramento-Stockton
66	KXTV	CBS	27	Sacramento-Stockton
69	KCRA	NBC	27	Sacramento-Stockton
105	WTVN	ABC	28	Columbus

Network affiliates ranked by the ratio of program expenses/gross revenues—Con.

Rank	Call letters	Net. aff.	Mkt. No.	Location
118	WLWC	NBC	28	Columbus
61	WBNS	CBS	28	Columbus
111	WHBQ	ABC	29	Memphis
92	WMC	NBC	29	Memphis
114	WREC	CBS	29	Memphis
22	WSIX	ABC	30	Nashville
49	WLAC	CBS	30	Nashville
16	WSM	NBC	30	Nashville
31	WWL	CBS	31	New Orleans
34	WVUE	ABC	31	New Orleans
55	WDSU	NBC	31	New Orleans
98	KMGH	CBS	32	Denver
42	KBTU	ABC	32	Denver
132	KOA	NBC	32	Denver
139	WSAZ	NBC	33	Charleston-Huntington
140	WCHS	CBS	33	Charleston-Huntington
102	WHTN	ABC	33	Charleston-Huntington
32	WTEV	ABC	34	Providence
91	WJAR	NBC	34	Providence
113	WPRI	CBS	34	Providence
47	WSOC	NBC	35	Charlotte
137	WCCB	ABC	35	Charlotte
20	WBTU	CBS	35	Charlotte
20	WHAS	CBS	36	Louisville
86	WAVE	NBC	36	Louisville
23	WLKY	ABC	36	Louisville
39	WTEN	CBS	37	Albany-Schenectady-T
4	WAST	ABC	37	Albany-Schenectady-T
129	WRGB	NBC	37	Albany-Schenectady-T
63	WAPI	NBC	38	Birmingham
144	WBRC	ABC	38	Birmingham
143	WBMG	CBS	38	Birmingham
87	WHIO	CBS	39	Dayton
83	WLWD	NBC	39	Dayton
121	WSPA	CBS	40	Gainesville-Spartansburg-Asheville
130	WFBC	NBC	40	Gainesville-Spartansburg-Asheville
60	WLOS	ABC	40	Gainesville-Spartansburg-Asheville
14	WZZM	ABC	41	Kalamazoo-Gr Rapids
142	WKZO	CBS	41	Kalamazoo-Gr Rapids
67	WGTU	NBC	41	Kalamazoo-Gr Rapids
25	KWTU	CBS	41	Oklahoma City
70	WKY	NBC	41	Oklahoma City
53	KOCO	ABC	41	Oklahoma City
54	WHEN	CBS	43	Syracuse
10	WSYR	NBC	43	Syracuse
18	WNYS	ABC	43	Syracuse
95	WVEC	ABC	44	Norl-Newp News-Hamp
84	WAVY	NBC	44	Norl-Newp News-Hamp
48	KTAR	NBC	45	Phoenix
75	KTVK	ABC	45	Phoenix
119	KOOL	CBS	45	Phoenix
38	KSAT	ABC	45	San Antonio
93	WOAI	NBC	45	San Antonio
134	KENS	CBS	45	San Antonio
29	WDHO	ABC	45	Toledo
107	WSPD	NBC	45	Toledo
122	WTOL	CBS	45	Toledo
21	WXII	ABC	45	Gnsb-High Pt-Win Sal
76	WFMY	CBS	45	Gnsb-High Pt-Win Sal
128	KFMB	CBS	49	San Diego
62	KGTU	NBC	49	San Diego
40	KCPX	ABC	50	Salt Lake City
6	KSL	CBS	50	Salt Lake City
11	KUTV	NBC	50	Salt Lake City

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Network Affiliates Ranked by Percent Minorities Employed

Rank	Call letters	Net. aff.	Mkt. No.	Location	SMSA	Total employees	Minorities employed		Factor
							Number	Percent	
1	KABC	ABC	2	Los Angeles	32,977	102	35	28.65%	0.871
2	KENS	CBS	45	San Antonio	32,677	70	17	24.25%	0.462
3	KGO	ABC	8	San Francisco	28,977	224	52	23.21%	0.803
4	WRC	NBC	10	Washington D.C.	28,877	227	51	22.47%	0.794
5	KNBC	NBC	2	Los Angeles	32,977	229	50	21.58%	0.684
6	KNBC	ABC	45	San Antonio	32,677	80	17	21.58%	0.404
7	WOAI	NBC	8	San Francisco	32,677	100	19	21.11%	0.651
8	KPIX	NBC	1	New York City	28,977	105	31	18.79%	0.619
9	KTVU	CBS	41	Oklahoma City	30,077	237	44	18.31%	1.443
10	KWB	CBS	1	New York City	30,077	88	46	15.87%	0.695
11	WGBS	CBS	10	Washington D.C.	28,877	280	46	15.87%	0.694
12	WTOP	NBC	7	Cleveland	12,677	103	34	17.62%	1.001
13	WKYC	NBC	28	Memphis	38,477	71	12	17.20%	1.365
14	WLWC	CBS	41	Oklahoma City	12,677	77	13	16.90%	1.440
15	WREC	CBS	29	Columbus	12,677	90	15	16.88%	1.340
16	KOCO	ABC	41	Oklahoma City	12,677	78	13	16.67%	1.323
17	WTVN	ABC	28	Memphis	38,477	78	15	16.67%	0.494
18	WHBQ	ABC	28	Memphis	38,477	100	31	16.32%	0.835
19	WJFK	CBS	18	Detroit	19,977	165	25	16.13%	0.413
20	WJFK	CBS	18	Miami	28,177	149	24	15.79%	0.675
21	WBAL	NBC	19	Baltimore	23,177	149	24	15.79%	0.401
22	WMAQ	NBC	3	Chicago	31,277	144	21	15.67%	0.898
23	WCKT	NBC	18	Miami	27,377	144	21	15.67%	0.362
24	KMOX	ABC	12	St. Louis	30,177	137	21	15.64%	0.752
25	WPLG	ABC	18	Miami	30,177	113	21	15.64%	0.580
26	KTAR	NBC	45	Phoenix	28,377	140	21	15.04%	0.689
27	WMAL	ABC	10	Washington D.C.	23,477	274	41	14.96%	0.462
28	WLS	ABC	3	Chicago	30,877	101	15	14.86%	0.462
29	KIRK	ABC	15	Illinois	30,877	180	28	14.81%	0.414
30	WABC	NBC	31	New Orleans	35,077	136	20	14.44%	0.413
31	WABC	NBC	31	New Orleans	35,077	90	23	14.44%	0.406
32	WVUE	ABC	17	Atlanta	23,677	111	10	14.08%	0.601
33	WAGA	CBS	17	Atlanta	23,677	114	10	14.08%	0.516
34	WQXI	NBC	44	Nor-Newp News-Hamp	23,677	114	10	14.08%	0.595
35	WQXI	NBC	17	Atlanta	23,677	136	19	13.97%	1.746
36	KING	NBC	16	Seattle-Tacoma	32,977	317	44	13.88%	0.422
37	KNXT	CBS	2	Los Angeles	32,977	94	13	13.88%	0.449
38	KHOU	CBS	15	Houston	30,877	124	17	13.71%	0.816
39	WFLA	NBC	24	Tampa-St. Petersburg	16,877	175	23	13.14%	1.933
40	WBZ	NBC	6	Boston	6,877	175	23	13.14%	1.933

Network Affiliates Ranked by Percent Minorities Employed—Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	SMSA	Total employees	Minorities employed Number percent	Factor
41	WHIO	CBS	39	Dayton.....	11.9%	122	16	13.11%
42	WPVI	ABC	4	Philadelphia.....	19.8%	153	20	13.07%
43	WBMM	CBS	3	Chicago.....	23.4%	300	39	13.00%
44	WCAU	CBS	9	Philadelphia.....	19.8%	70	9	12.86%
45	KFMB	CBS	49	San Diego.....	20.6%	113	14	12.39%
46	KOOL	CBS	28	Phoenix.....	20.0%	105	13	12.38%
47	WSOC	NBC	45	Charlotte.....	23.9%	114	14	12.28%
48	WTAR	NBC	34	Charlotte.....	27.3%	106	13	12.28%
49	WMAZ	NBC	44	North-News-Hamp	20.6%	132	16	12.15%
50	WEMG	CBS	40	San Diego.....	30.0%	133	16	12.12%
51	KRON	NBC	38	Birmingham.....	28.0%	207	25	12.08%
52	WBRC	ABC	8	San Francisco.....	20.3%	83	10	12.05%
53	KDFW	CBS	38	Birmingham.....	21.3%	134	16	11.94%
54	KYW	NBC	11	Dallas-Fort Worth.....	19.8%	202	24	11.88%
55	WJW	NBC	7	Cleveland.....	22.0%	128	15	11.72%
56	KORA	NBC	27	Sacramento-Stockton.....	18.7%	70	8	11.43%
57	WSIX	ABC	30	Nashville.....	23.6%	149	17	11.41%
58	WBB	NBC	17	Atlanta.....	7.8%	167	19	11.38%
59	KDKA	CBS	9	Pittsburgh.....	20.3%	80	10	11.37%
60	KRC	NBC	15	Houston.....	12.6%	125	14	11.18%
61	WNC	NBC	28	Columbus.....	38.1%	132	15	11.29%
62	WNC	NBC	29	Memphis.....	21.3%	147	16	10.89%
63	WMAZ	CBS	19	Baltimore.....	21.3%	186	20	10.75%
64	WFAA	ABC	11	Dallas-Fort Worth.....	11.8%	84	9	10.71%
65	WKRC	ABC	20	Cincinnati.....	21.3%	141	15	10.64%
66	WBAP	NBC	11	Dallas-Fort Worth.....	20.3%	67	7	10.45%
67	WHP	ABC	48	Greensboro-High Point-Winston-Salem.....	5.0%	77	8	10.39%
68	WNY	ABC	35	Syracuse.....	9.9%	87	9	10.24%
69	WKW	ABC	28	Buffalo.....	17.3%	107	11	10.20%
70	WKBW	ABC	12	St. Louis.....	20.0%	107	11	10.20%
71	KTVI	NBC	20	Dayton.....	11.8%	78	8	10.20%
72	KTVI	NBC	20	Dayton.....	20.0%	107	11	10.20%
73	KTVI	NBC	20	Dayton.....	20.0%	107	11	10.20%
74	WWT	NBC	46	Phoenix.....	11.8%	78	8	10.20%
75	WWT	NBC	20	Cincinnati.....	20.0%	107	11	10.20%
76	KMGH	CBS	5	Detroit.....	16.8%	120	15	10.17%
77	WXYZ	ABC	32	Detroit.....	19.9%	120	15	10.17%
78	KMBC	ABC	5	Detroit.....	19.9%	120	15	10.17%
79	KOVR	ABC	23	Kansas City.....	14.6%	103	10	9.71%
80	WLVI	ABC	27	Sacramento-Stockton.....	22.0%	93	9	9.68%
81	WIZ	ABC	14	Indianapolis.....	13.4%	137	13	9.49%
82	WRTV	ABC	14	Indianapolis.....	13.4%	127	12	9.49%
83	KCMO	CBS	23	Kansas City.....	14.6%	96	9	9.38%

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84	WGR	NBC	25	Buffalo	9.9%	86	8	9.36%	0.940
85	WKY	NBC	41	Oklaoma City	12.6%	119	11	9.24%	0.731
86	WLAC	CBS	30	Nashville	18.7%	119	11	9.24%	0.494
87	WLOS	ABC	40	Gadnesville-Spartanburg-Ashtle	13.6%	76	7	9.21%	0.677
88	WWL	CBS	31	New Orleans	33.6%	109	10	9.17%	0.558
89	WNAZ	CBS	6	Boston	6.8%	167	15	8.98%	1.21
90	WTOL	NBC	45	Toledo	10.5%	79	7	8.80%	0.844
91	WFHC	NBC	45	Grville-Spaling-Ashl	13.6%	57	5	8.77%	0.645
92	WISH	CBS	14	Indianapolis	13.4%	80	7	8.75%	0.653
93	WTV	CBS	11	Portland	3.2%	126	11	8.73%	1.079
94	KWW	CBS	27	Stamford	7.7%	81	7	8.64%	0.459
95	WVAZ	NBC	33	Charleston-Huntingto	7.8%	81	7	8.64%	1.829
96	WVC	NBC	9	Pittsburgh	23.9%	111	12	8.33%	1.068
97	WVCB	ABC	35	Charlotte	3.4%	24	2	8.33%	0.219
98	WTV	ABC	34	Providence	11.8%	72	6	8.33%	2.431
99	WTV	CBS	22	Hartford-New Haven	23.9%	114	12	8.33%	0.796
100	WTV	CBS	35	Charlotte	13.6%	121	10	8.33%	0.216
101	WTV	NBC	41	Kalamazoo-Gr Rapids	6.1%	169	9	8.33%	1.254
102	WAVE	NBC	36	Louisville	13.6%	110	9	8.33%	0.629
103	WVTV	CBS	24	Tampa-St. Petersburg	16.8%	123	10	8.13%	0.484
104	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.506
105	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	1.000
106	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
107	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	1.000
108	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
109	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
110	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
111	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
112	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
113	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
114	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
115	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
116	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
117	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
118	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
119	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
120	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
121	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
122	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
123	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
124	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
125	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
126	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
127	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
128	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
129	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
130	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
131	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
132	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460
133	WVTV	CBS	40	Grville-Spaling-Ashl	13.6%	71	6	8.11%	0.460

Network Affiliates Ranked by Percent Minorities Employed—Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	SMSA	Total employees	Minorities employed Number percent	Factor
134	KOMO	ABC	16	Seattle-Tacoma	8.0%	158	7	4.43%
135	WLCY	ABC	24	Tampa-St. Petersburg	10.0%	170	3	1.76%
136	WISN	CBS	21	Milwaukee	10.0%	101	3	2.97%
137	KCPX	ABC	60	Salt Lake City	9.0%	81	2	2.47%
138	WBEN	CBS	25	Buffalo	9.0%	136	3	2.13%
139	WCCO	CBS	13	Minneapolis-St. Paul	3.4%	301	7	2.33%
140	WJAR	NBC	34	Providence	3.4%	302	3	0.96%
141	WDHO	ABC	45	Toledo	10.0%	41	1	2.44%
142	WTTN	NBC	13	Minneapolis-St. Paul	3.7%	158	3	1.90%
143	WREB	NBC	37	Albany-Schenectady-Troy	4.4%	78	1	1.28%
144	KSTU	NBC	60	Salt Lake City	6.0%	87	1	1.15%
145	KSL	CBS	50	Salt Lake City	3.1%	137	1	0.73%
146	KMSP	ABC	13	Minneapolis-St. Paul	3.1%	69	0	0.0%
147	WKZO	CBS	41	Kalamazoo-Gr. Rapids	6.1%	69	0	0.0%

Network Affiliates Ranked by Percent Minorities Employed

Rank	Call letters	Net. aff.	Mkt. No.	Location	SMSA	Total employees	Minorities employed Number Percent	Factor
9	WNBC	NBC	1	New York City	30.0%	237	44	18.57%
11	WCBS	CBS	1	New York City	30.0%	280	50	17.86%
30	WABC	ABC	1	New York City	30.0%	189	28	14.81%
1	KABC	ABC	2	Los Angeles	32.9%	192	55	28.65%
5	KNBC	NBC	2	Los Angeles	32.9%	229	50	21.83%
27	WXTV	NBC	3	Los Angeles	32.9%	317	44	13.88%
28	WLS	ABC	3	Chicago	23.4%	342	54	15.79%
43	WBMM	CBS	3	Chicago	23.4%	274	41	14.96%
42	WPVI	ABC	4	Philadelphia	23.4%	300	39	13.00%
44	WCAU	CBS	4	Philadelphia	19.8%	153	20	13.07%
54	KYW	NBC	5	Detroit	19.8%	202	24	11.88%
19	WJBK	CBS	5	Detroit	19.8%	180	31	16.32%
75	WWJ	NBC	5	Detroit	19.8%	149	15	10.07%
77	WXYZ	ABC	5	Detroit	19.8%	213	21	9.86%
40	WBZ	NBC	6	Boston	6.8%	175	23	13.14%
39	WVAC	CBS	6	Boston	6.8%	167	15	8.98%
13	WKYC	NBC	7	Cleveland	17.6%	143	34	17.62%

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55	WJW	CBS	7	Cleveland	152	18	11.84%	0.673
106	WEWS	ABC	8	Cleveland	140	11	7.80%	0.483
3	KGO	CBS	224	San Francisco	224	52	23.21%	0.883
5	KGO	CBS	165	San Francisco	165	21	12.06%	0.650
58	KRON	NBC	207	San Francisco	207	19	11.38%	1.459
59	KDKA	CBS	7	Pittsburgh	144	12	8.33%	1.068
96	WHC	NBC	7	Pittsburgh	130	9	6.92%	0.888
119	WTAE	ABC	227	Pittsburgh	227	51	22.47%	0.794
4	WRC	NBC	136	Washington, D.C.	136	24	17.65%	0.590
12	WTOP	CBS	140	Washington, D.C.	140	21	15.00%	0.590
27	WMAL	ABC	134	Washington, D.C.	134	16	11.94%	0.561
53	KDFW	CBS	186	Dallas-Fort Worth	186	20	10.72%	0.563
65	WFAA	ABC	141	Dallas-Fort Worth	141	15	10.54%	0.499
67	KMAX	CBS	148	Dallas-Fort Worth	148	23	16.54%	0.868
72	KTVI	ABC	117	St. Louis	117	11	9.38%	0.504
117	KSD	NBC	201	St. Louis	201	8	6.96%	0.402
139	WCCO	CBS	158	Minneapolis-St. Paul	158	3	3.42%	0.941
142	KSLP	NBC	59	Minneapolis-St. Paul	59	0	1.90%	0.513
146	KMSP	ABC	127	Minneapolis-St. Paul	127	9	9.68%	0.722
80	WLWI	ABC	93	Indianapolis	93	12	9.45%	0.705
82	WRTV	NBC	80	Indianapolis	80	7	8.75%	0.653
92	WISH	ABC	101	Indianapolis	101	15	14.85%	0.482
29	KTRK	ABC	94	Houston	94	13	13.85%	0.491
38	KTRK	ABC	125	Houston	125	13	13.85%	0.564
39	KING	NBC	138	Houston	138	13	13.85%	1.746
121	KIRO	CBS	8	Seattle-Tacoma	8	8	6.72%	0.840
134	WAGA	ABC	138	Seattle-Tacoma	138	7	4.43%	0.554
33	WQXI	CBS	141	Atlanta	141	20	14.14%	0.501
35	WSB	NBC	114	Atlanta	114	16	14.04%	0.595
58	WTVT	NBC	149	Atlanta	149	17	11.41%	0.483
20	WCKT	NBC	155	Miami	155	25	16.13%	0.413
23	WPLG	ABC	134	Miami	134	21	15.67%	0.401
25	WFLA	ABC	137	Miami	137	21	15.33%	0.392
21	WAXL	NBC	149	Baltimore	149	24	16.11%	0.422
81	WIZ	ABC	137	Baltimore	137	16	10.86%	0.378
66	WKRC	ABC	251	Baltimore	251	13	10.71%	0.998
74	WLWT	NBC	266	Baltimore	266	9	10.19%	0.864
133	WCPO	NBC	134	Cincinnati	134	21	4.48%	0.379
108	WTMJ	NBC	146	Cincinnati	146	6	7.53%	0.769
130	WTI	ABC	120	Milwaukee	120	11	5.00%	0.510
136	WISN	CBS	144	Milwaukee	144	4	3.96%	0.404
99	WTNH	CBS	81	Harford-New Haven	81	12	8.53%	0.706
109	WTNH	ABC	69	Harford-New Haven	69	6	7.41%	0.625
111	KING	ABC	103	Harford-New Haven	103	5	7.25%	0.444
83	KCMO	CBS	96	Kansas City	96	10	9.38%	0.642
120	WDAF	NBC	73	Kansas City	73	9	6.85%	0.409

Network Affiliates Ranked by Percent Minorities Employed—Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	SMSA	Total employees	Minorities employed Number percent	Factor
39	WFLA	NBC	24	Tampa-St. Petersburg	16.87	124	17	0.810
103	WTVT	NBC	34	Tampa-St. Petersburg	16.87	123	10	0.866
135	WLCY	ABC	34	Tampa-St. Petersburg	16.87	70	3	0.254
70	WKRW	ABC	25	Buffalo	9.97	87	9	1.050
84	WGR	NBC	25	Buffalo	9.97	86	8	0.900
138	WHEN	NBC	25	Buffalo	9.97	136	5	0.371
93	KOW	NBC	26	Portland	6.27	126	11	1.079
126	KATU	ABC	26	Portland	6.27	98	6	1.177
129	KOIN	CBS	26	Portland	6.27	98	6	1.177
56	KCRA	NBC	27	Sacramento-Stockton	5.27	128	5	0.981
79	KYR	ABC	27	Sacramento-Stockton	5.27	98	5	0.981
90	KYTV	NBC	27	Sacramento-Stockton	5.27	123	10	0.441
14	WTVC	NBC	28	Columbus	22.07	84	7	0.441
17	WTN	ABC	28	Columbus	22.07	93	16	0.393
62	WBNS	CBS	28	Columbus	22.07	90	15	1.365
15	WREC	CBS	28	Columbus	22.07	127	11	0.323
28	WMBQ	ABC	29	Memphis	12.67	71	11	0.875
63	WMC	NBC	29	Memphis	12.67	78	13	0.431
57	WSIX	ABC	30	Nashville	38.47	82	9	0.286
86	WLAC	CBS	30	Nashville	38.47	70	8	0.611
115	WSM	NBC	30	Nashville	38.47	119	11	0.494
31	WSTU	NBC	31	New Orleans	18.77	111	8	0.375
82	WVLE	ABC	31	New Orleans	35.67	136	20	0.413
86	WVLE	ABC	31	New Orleans	35.67	109	13	0.406
76	KMGH	CBS	32	Denver	35.67	120	12	0.288
113	KBTU	ABC	32	Denver	16.87	113	8	0.295
132	KOA	NBC	32	Denver	16.87	113	8	0.295
95	WSAZ	NBC	33	Charleston-Huntingto.	16.87	87	4	0.271
107	WHTN	ABC	33	Charleston-Huntingto.	16.87	81	7	0.371
110	WCHS	CBS	33	Charleston-Huntingto.	16.87	81	4	1.609
98	WTEV	ABC	34	Providence	4.77	51	4	1.576
122	WPRI	CBS	34	Providence	4.77	51	4	2.451
140	WJAR	NBC	34	Providence	3.47	72	6	1.935
97	WFOU	NBC	35	Charlotte	3.47	76	5	0.865
97	WFOU	NBC	35	Charlotte	3.47	102	3	0.514
100	WBTV	ABC	35	Charlotte	23.97	121	14	0.349
102	WAVE	NBC	35	Charlotte	23.97	121	14	0.349
112	WLKY	ABC	36	Louisville	13.07	110	9	0.549
				Louisville	13.07	56	4	

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131	WHAS	CBS	Louisville	105	5	4.76%	0.365
132	WAST	ABC	Albany-Schenectady-T.	63	4	6.35%	1.143
133	WTEN	CBS	Albany-Schenectady-T.	76	1	1.4%	1.195
134	WRGB	NBC	Albany-Schenectady-T.	38	3	9.28%	0.294
135	WBNG	CBS	Birmingham	83	3	12.12%	0.402
136	WBRC	ABC	Birmingham	83	3	12.05%	0.402
137	WAPI	NBC	Birmingham	122	10	6.56%	0.219
138	WHD	CBS	Dayton	107	11	13.11%	1.102
139	WLOS	NBC	Dayton	107	11	10.28%	0.894
140	WPC	ABC	Dayton	76	7	9.21%	0.677
141	WPC	ABC	Dayton	57	5	8.77%	0.645
142	WPC	ABC	Dayton	71	6	8.11%	0.690
143	WPC	ABC	Dayton	109	9	8.25%	1.354
144	WPC	ABC	Dayton	71	5	7.0%	1.354
145	WPC	ABC	Dayton	69	0	0.0%	0.0
146	WPC	ABC	Dayton	68	0	0.0%	0.0
147	WPC	ABC	Dayton	77	0	0.0%	0.0
148	WPC	ABC	Dayton	110	13	16.88%	1.443
149	WPC	ABC	Dayton	77	13	16.88%	1.443
150	WPC	ABC	Dayton	77	13	16.88%	1.443
151	WPC	ABC	Dayton	77	13	16.88%	1.443
152	WPC	ABC	Dayton	77	13	16.88%	1.443
153	WPC	ABC	Dayton	77	13	16.88%	1.443
154	WPC	ABC	Dayton	77	13	16.88%	1.443
155	WPC	ABC	Dayton	77	13	16.88%	1.443
156	WPC	ABC	Dayton	77	13	16.88%	1.443
157	WPC	ABC	Dayton	77	13	16.88%	1.443
158	WPC	ABC	Dayton	77	13	16.88%	1.443
159	WPC	ABC	Dayton	77	13	16.88%	1.443
160	WPC	ABC	Dayton	77	13	16.88%	1.443
161	WPC	ABC	Dayton	77	13	16.88%	1.443
162	WPC	ABC	Dayton	77	13	16.88%	1.443
163	WPC	ABC	Dayton	77	13	16.88%	1.443
164	WPC	ABC	Dayton	77	13	16.88%	1.443
165	WPC	ABC	Dayton	77	13	16.88%	1.443
166	WPC	ABC	Dayton	77	13	16.88%	1.443
167	WPC	ABC	Dayton	77	13	16.88%	1.443
168	WPC	ABC	Dayton	77	13	16.88%	1.443
169	WPC	ABC	Dayton	77	13	16.88%	1.443
170	WPC	ABC	Dayton	77	13	16.88%	1.443
171	WPC	ABC	Dayton	77	13	16.88%	1.443
172	WPC	ABC	Dayton	77	13	16.88%	1.443
173	WPC	ABC	Dayton	77	13	16.88%	1.443
174	WPC	ABC	Dayton	77	13	16.88%	1.443
175	WPC	ABC	Dayton	77	13	16.88%	1.443
176	WPC	ABC	Dayton	77	13	16.88%	1.443
177	WPC	ABC	Dayton	77	13	16.88%	1.443
178	WPC	ABC	Dayton	77	13	16.88%	1.443
179	WPC	ABC	Dayton	77	13	16.88%	1.443
180	WPC	ABC	Dayton	77	13	16.88%	1.443
181	WPC	ABC	Dayton	77	13	16.88%	1.443
182	WPC	ABC	Dayton	77	13	16.88%	1.443
183	WPC	ABC	Dayton	77	13	16.88%	1.443
184	WPC	ABC	Dayton	77	13	16.88%	1.443
185	WPC	ABC	Dayton	77	13	16.88%	1.443
186	WPC	ABC	Dayton	77	13	16.88%	1.443
187	WPC	ABC	Dayton	77	13	16.88%	1.443
188	WPC	ABC	Dayton	77	13	16.88%	1.443
189	WPC	ABC	Dayton	77	13	16.88%	1.443
190	WPC	ABC	Dayton	77	13	16.88%	1.443
191	WPC	ABC	Dayton	77	13	16.88%	1.443
192	WPC	ABC	Dayton	77	13	16.88%	1.443
193	WPC	ABC	Dayton	77	13	16.88%	1.443
194	WPC	ABC	Dayton	77	13	16.88%	1.443
195	WPC	ABC	Dayton	77	13	16.88%	1.443
196	WPC	ABC	Dayton	77	13	16.88%	1.443
197	WPC	ABC	Dayton	77	13	16.88%	1.443
198	WPC	ABC	Dayton	77	13	16.88%	1.443
199	WPC	ABC	Dayton	77	13	16.88%	1.443
200	WPC	ABC	Dayton	77	13	16.88%	1.443

Network Affiliates Ranked by Ratio of Percent Minorities Employed to Percent Minorities in SMSA—Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	SMSA	Total employees	Minorities employed		Factor
							Number	Percent	
63	WNBC	NBC	1	New York City	30.0%	237	44	18.57%	0.619
76	WBS	CBS	1	New York City	30.0%	280	50	17.86%	0.585
90	WABC	ABC	1	New York City	30.0%	280	50	17.86%	0.585
34	KNBC	ABC	2	Los Angeles	32.9%	192	55	28.65%	0.871
55	KNBC	NBC	2	Los Angeles	32.9%	229	50	21.83%	0.661
112	KNXT	CBS	3	Los Angeles	32.9%	317	44	13.88%	0.422
61	WMAQ	NBC	3	Chicago	23.4%	342	54	15.79%	0.675
63	WLS	ABC	3	Chicago	23.4%	274	41	14.96%	0.639
81	WBBM	CBS	3	Chicago	23.4%	300	39	13.00%	0.556
56	WPVI	ABC	4	Philadelphia	13.8%	153	20	13.07%	0.669
69	WCAU	CBS	4	Philadelphia	13.8%	202	9	4.46%	0.600
73	WTWK	CBS	4	Philadelphia	13.8%	202	21	10.40%	0.820
10	WTK	CBS	5	Detroit	13.8%	190	21	11.05%	0.569
90	WWJ	NBC	5	Detroit	13.8%	190	33	17.37%	0.869
97	WXYZ	ABC	5	Detroit	13.8%	213	21	9.86%	0.465
4	WBZ	NBC	6	Boston	6.8%	175	23	13.14%	1.933
10	WNAC	CBS	6	Boston	6.8%	167	15	8.98%	1.321
26	WKYC	NBC	7	Cleveland	17.6%	193	34	17.62%	1.001
52	WJW	CBS	7	Cleveland	17.6%	152	18	11.84%	0.673
107	WEWS	ABC	7	Cleveland	17.6%	140	11	7.86%	0.446
42	KGO	ABC	8	San Francisco	28.9%	224	52	23.21%	0.803
58	KPIX	CBS	8	San Francisco	28.9%	165	31	18.79%	0.650
114	KRON	NBC	9	San Francisco	28.9%	207	25	12.08%	0.418
11	KRON	CBS	9	Pittsburgh	7.8%	167	11	6.59%	1.459
21	WTCA	NBC	9	Pittsburgh	7.8%	167	12	7.24%	1.459
32	WTAE	ABC	10	Pittsburgh	7.8%	130	9	6.92%	0.888
43	WRC	NBC	10	Washington D.C.	28.3%	227	51	22.47%	0.794
66	WTOP	CBS	10	Washington D.C.	28.3%	136	24	17.65%	0.624
87	WMAL	ABC	10	Washington D.C.	28.3%	140	21	15.00%	0.530
80	KDFW	CBS	11	Dallas-Fort Worth	21.3%	134	16	11.94%	0.561
95	WFAA	ABC	11	Dallas-Fort Worth	21.3%	186	20	10.75%	0.505
96	WBAP	NBC	11	Dallas-Fort Worth	21.3%	141	15	10.64%	0.499
31	KMOX	CBS	12	St. Louis	17.3%	148	23	15.54%	0.898
78	KTVI	ABC	12	St. Louis	17.3%	107	11	10.28%	0.594
121	KSD	NBC	12	St. Louis	17.3%	115	8	6.96%	0.402

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28	WCCO	CBS	13	Minneapolis-St. Paul	3.7%	201	7	3.48%	0.941
91	KSTP	NBC	13	Minneapolis-St. Paul	3.7%	188	3	1.90%	0.513
106	KNSP	ABC	13	Minneapolis-St. Paul	3.7%	93	0	0.0%	0.0
47	WLWI	ABC	14	Indianapolis	13.4%	127	9	9.68%	0.722
49	WETV	NBC	14	Indianapolis	13.4%	80	12	9.45%	0.705
57	WISH	CBS	14	Indianapolis	13.4%	101	7	8.75%	0.633
102	KTRK	ABC	15	Houston	30.8%	94	15	14.85%	0.482
106	KHOU	ABC	15	Houston	30.8%	125	13	13.83%	0.449
132	KING	NBC	15	Houston	30.8%	136	14	11.20%	0.294
30	KIRO	NBC	16	Seattle-Tacoma	8.0%	119	19	13.97%	0.440
82	KOMO	CBS	16	Seattle-Tacoma	8.0%	118	7	4.15%	0.554
72	WAGA	ABC	16	Atlanta	23.6%	111	20	14.15%	0.601
77	WQXI	CBS	17	Atlanta	23.6%	111	16	14.04%	0.595
101	WSB	ABC	17	Atlanta	23.6%	149	17	11.41%	0.483
116	WTVJ	NBC	18	Miami	30.1%	155	25	16.13%	0.413
124	WCKT	CBS	18	Miami	30.1%	134	25	15.67%	0.401
125	WPLG	ABC	19	Baltimore	25.1%	137	21	15.33%	0.392
62	WBAL	CBS	19	Baltimore	25.1%	149	24	16.11%	0.613
11	WJAR	CBS	19	Baltimore	25.1%	117	16	10.58%	0.394
136	WKRC	ABC	19	Baltimore	25.1%	137	13	9.47%	0.379
36	WKRC	ABC	20	Cincinnati	11.8%	81	9	10.19%	0.861
36	WLWT	NBC	20	Cincinnati	11.8%	234	21	4.45%	0.379
127	WCPO	CBS	20	Cincinnati	11.8%	145	11	7.53%	0.760
44	WIMJ	NBC	21	Milwaukee	9.8%	130	6	5.10%	0.510
93	WITI	ABC	21	Milwaukee	9.8%	101	4	3.96%	0.404
118	WISN	CBS	21	Milwaukee	9.8%	144	12	8.33%	0.706
48	WTIC	CBS	22	Hartford-New Haven	11.8%	81	6	7.41%	0.628
65	WTNH	ABC	22	Hartford-New Haven	11.8%	69	5	7.25%	0.614
69	WHNB	ABC	22	Hartford-New Haven	11.8%	103	10	9.71%	0.455
63	WABC	NBC	23	Kansas City	14.6%	96	2	3.35%	0.492
63	KCMO	CBS	23	Kansas City	14.6%	73	17	13.71%	0.489
103	WDAF	NBC	23	Kansas City	14.6%	124	17	13.71%	0.816
41	WFLA	NBC	24	Tampa-St. Petersburg	16.8%	124	10	8.13%	0.484
100	WTVT	CBS	24	Tampa-St. Petersburg	16.8%	124	10	8.13%	0.484
140	WLCY	ABC	24	Tampa-St. Petersburg	16.8%	70	3	4.29%	0.255
25	WKBW	ABC	25	Buffalo	9.9%	87	8	10.34%	1.045
29	WGR	NBC	25	Buffalo	9.9%	136	5	9.30%	0.940
130	WREN	CBS	25	Buffalo	9.9%	136	5	9.30%	0.940
7	KOW	NBC	26	Portland	5.2%	98	11	8.73%	1.679
21	KATU	ABC	26	Portland	5.2%	98	6	6.12%	1.177
27	KOR	ABC	26	Portland	5.2%	128	5	3.10%	0.381
36	KORA	NBC	27	Sacramento-Stockton	22.0%	128	15	11.72%	0.533

Network Affiliates Ranked by Ratio of Percent-Minorities Employed to Percent Minorities in SMSA—Continued

Rank	Call letters	Net. aff.	Mkt. No.	Location	SMSA	Total employees	Minorities employed		Factor
							Number	percent	
108	KOVR	ABC		Sacramento-Stockton	22.0%	103	10	9.71%	0.441
125	KXVA	NBC		Sacramento-Stockton	22.0%	81	7	8.54%	0.393
13	WLAC	NBC		Columbus	12.6%	93	7	7.53%	0.315
18	WTNS	ABC		Columbus	12.6%	90	16	17.78%	1.323
33	WBNS	ABC		Columbus	12.6%	127	15	11.81%	0.875
100	WBFC	CBS		Memphis	38.4%	71	14	19.72%	0.440
20	WHBO	ABC		Memphis	38.4%	78	13	16.67%	0.434
136	WMC	NBC		Memphis	38.4%	82	9	10.98%	0.286
70	WSIX	ABC		Nashville	18.7%	70	8	11.43%	0.611
98	WLAC	ABC		Nashville	18.7%	111	11	9.91%	0.404
120	WSM	NBC		Nashville	18.7%	114	8	7.02%	0.375
116	DTT	NBC		New Orleans	35.6%	126	12	9.52%	0.413
137	KWLF	CBS		New Orleans	35.6%	90	10	11.11%	0.406
75	KMGG	CBS		New Orleans	35.6%	109	10	9.17%	0.355
113	KBTU	ABC		Denver	16.8%	113	12	10.62%	0.605
138	KOA	ABC		Denver	16.8%	97	8	8.25%	0.321
5	WSAZ	NBC		Charleston-Huntingto	4.7%	81	4	4.94%	0.274
8	WHTN	ABC		Charleston-Huntingto	4.7%	81	7	8.64%	1.589
10	WCHS	ABC		Charleston-Huntingto	4.7%	51	4	7.84%	1.660
1	WTFV	ABC		Providence	3.4%	72	4	5.56%	1.576
3	WPRI	CBS		Providence	3.4%	72	6	8.33%	2.451
35	WJAR	NBC		Providence	3.4%	72	5	6.94%	1.935
133	WCCB	ABC		Charlotte	23.9%	102	3	2.94%	0.865
134	WCTV	NBC		Charlotte	23.9%	114	3	2.63%	0.311
26	Louisville	CBS		Louisville	23.9%	114	11	9.65%	0.346
64	WLKY	NBC		Louisville	23.9%	121	10	8.26%	0.329
84	WLKY	ABC		Louisville	23.9%	110	9	8.18%	0.319
131	WLAS	CBS		Louisville	23.9%	56	4	7.14%	0.306
12	WAST	ABC		Albany-Schenectady-T	13.0%	105	5	4.76%	1.443
37	WTEN	ABC		Albany-Schenectady-T	13.0%	63	4	6.35%	1.196
37	WTEN	NBC		Albany-Schenectady-T	13.0%	76	4	5.26%	1.196
135	WREG	NBC		Albany-Schenectady-T	13.0%	78	1	1.28%	0.291

119	WBMG	CBS	38	Birmingham	30.0%	33	4	12.12%	0.401
122	WBRC	ABC	38	Birmingham	30.0%	83	10	12.12%	0.401
143	WPXI	NBC	38	Birmingham	30.0%	83	10	12.12%	0.401
23	WHIO	CBS	39	Dayton	11.5%	105	11	13.11%	1.107
37	WLD	NBC	39	Dayton	11.5%	105	11	13.11%	0.861
50	WLOS	ABC	40	Greenville-Spartanburg	13.6%	76	7	9.21%	0.677
60	WFBC	ABC	40	Greenville-Spartanburg	13.6%	57	5	8.77%	0.645
74	WVA	NBC	40	Greenville-Spartanburg	13.6%	71	6	8.11%	0.306
11	WTV	NBC	41	Kalamazoo-Gr. Rapids	6.1%	106	9	8.29%	1.354
22	WZZM	ABC	41	Kalamazoo-Gr. Rapids	6.1%	71	5	7.03%	1.154
147	WKZO	CBS	41	Kalamazoo-Gr. Rapids	6.1%	69	0	0.0%	0.0
13	KWTV	ABC	41	Oklaoma City	12.6%	88	86	18.18%	1.443
17	KOCO	ABC	41	Oklaoma City	12.6%	77	13	16.38%	1.600
46	WKY	NBC	43	Oklaoma City	12.6%	77	11	10.30%	0.734
9	WYLS	ABC	43	Syracuse	5.0%	75	6	8.40%	1.600
14	WYR	CBS	43	Syracuse	5.0%	101	7	6.03%	1.386
88	WAYT	NBC	44	News-Hamp	27.3%	71	10	14.08%	0.516
105	WVEC	NBC	44	News-Hamp	27.3%	106	13	12.20%	0.419
114	WVBC	ABC	44	News-Hamp	27.3%	78	5	6.41%	0.235
15	KTVR	ABC	45	Phoenix	20.0%	113	17	15.04%	0.752
67	KOOL	CBS	45	Phoenix	20.0%	105	13	12.38%	0.619
92	KTVK	ABC	45	Phoenix	20.0%	78	8	10.26%	0.513
104	KENS	CBS	45	San Antonio	52.0%	70	17	24.26%	0.402
120	KSAT	ABC	45	San Antonio	52.0%	80	17	24.26%	0.401
123	WOAI	NBC	45	San Antonio	52.0%	79	17	24.26%	0.401
38	WTOL	CBS	45	Toledo	10.5%	86	7	8.86%	0.844
54	WSPD	NBC	45	Toledo	10.5%	86	6	6.98%	0.661
142	WDHO	ABC	45	Toledo	10.5%	41	1	2.41%	0.232
83	WYAT	ABC	48	Grish-High Pt.-Win Sal	20.3%	89	10	11.24%	0.553
88	WYAT	ABC	48	Grish-High Pt.-Win Sal	20.3%	67	7	10.45%	0.515
137	WXL	NBC	48	Grish-High Pt.-Win Sal	20.3%	87	5	5.75%	0.283
71	KEMH	CBS	49	San Diego	20.6%	113	14	12.39%	0.601
79	KGTU	NBC	49	San Diego	20.6%	132	16	12.12%	0.588
85	KCPX	ABC	50	Salt Lake City	6.9%	81	3	3.19%	0.387
144	KUTV	NBC	50	Salt Lake City	6.9%	87	1	1.15%	0.147
145	KSL	CBS	50	Salt Lake City	6.9%	137	1	0.73%	0.108

Network Affiliates Ranked by Percent Minorities Employed in High Pay Positions

Rank	Call letters	Net. aff.	Mkt. No.	Location	High pay positions	High pay minorities employed	
						Number	Percent
11	WNBC	NBC	1	New York City.....	179	26	14.53%
19	WCBS	CBS	1	New York City.....	181	23	12.71%
45	WABC	ABC	1	New York City.....	138	13	9.42%
1	KABC	ABC	2	Los Angeles.....	162	45	27.78%
5	KNBC	NBC	2	Los Angeles.....	174	29	16.67%
31	KNXT	CBS	2	Los Angeles.....	233	28	11.97%
27	WMAQ	NBC	3	Chicago.....	236	27	11.44%
30	WLS	ABC	3	Chicago.....	224	25	11.16%
58	WBBM	CBS	3	Chicago.....	211	17	8.06%
26	WPVI	ABC	4	Philadelphia.....	121	14	11.57%
48	WCAU	CBS	4	Philadelphia.....	56	5	8.93%
96	KYW	NBC	4	Philadelphia.....	159	9	5.66%
55	WWJ	NBC	5	Detroit.....	129	11	8.53%
60	WJBK	CBS	5	Detroit.....	138	11	7.97%
62	WXYZ	ABC	5	Detroit.....	181	14	7.73%
64	WNAC	CBS	6	Boston.....	132	10	7.58%
75	WBZ	NBC	6	Boston.....	131	9	6.87%
18	WKYC	NBC	7	Cleveland.....	155	20	12.90%
62	WJW	CBS	7	Cleveland.....	115	10	8.70%
90	WEWS	ABC	7	Cleveland.....	116	7	6.03%
3	KGO	ABC	8	San Francisco.....	189	38	20.11%
15	KPIX	CBS	8	San Francisco.....	110	15	13.64%
34	KRON	NBC	8	San Francisco.....	165	18	10.91%
85	WHIC	NBC	9	Pittsburgh.....	120	8	6.67%
84	KDKA	CBS	9	Pittsburgh.....	107	7	6.54%
105	WTAE	ABC	9	Pittsburgh.....	103	5	4.85%
6	WRC	NBC	10	Washington, D.C.....	170	27	15.88%
12	WTOP	CBS	10	Washington, D.C.....	111	16	14.41%
17	WMAL	ABC	10	Washington, D.C.....	123	17	13.28%
63	KDFW	CBS	11	Dallas-Fort Worth.....	105	8	7.62%
98	WBAP	NBC	11	Dallas-Fort Worth.....	112	7	6.25%
97	WFAA	ABC	11	Dallas-Fort Worth.....	148	8	5.41%
85	KMOX	CBS	12	St. Louis.....	110	7	6.36%
91	KTVI	ABC	12	St. Louis.....	83	5	6.02%
134	KSD	NBC	12	St. Louis.....	94	2	2.13%
137	WCCO	CBS	13	Minneapolis-St. Paul.....	162	3	1.85%
138	KSTP	NBC	13	Minneapolis-St. Paul.....	119	2	1.68%
146	KMSF	ABC	13	Minneapolis-St. Paul.....	48	0	0.0%
70	WRTV	NBC	14	Indianapolis.....	97	7	7.22%
87	WISH	CBS	14	Indianapolis.....	64	4	6.25%
139	WLWI	ABC	14	Indianapolis.....	66	1	1.52%
36	KHOU	CBS	15	Houston.....	75	8	10.67%
37	KTRK	ABC	15	Houston.....	75	8	10.67%
50	KPRC	NBC	15	Houston.....	102	9	8.82%
13	KING	NBC	16	Seattle-Tacoma.....	112	16	14.29%
100	KIRO	CBS	16	Seattle-Tacoma.....	94	5	5.32%
120	KOMO	ABC	16	Seattle-Tacoma.....	132	5	3.79%
21	WSB	NBC	17	Atlanta.....	104	13	12.50%
24	WAGA	CBS	17	Atlanta.....	109	13	11.93%
51	WXIA	ABC	17	Atlanta.....	80	7	8.75%
14	WTVJ	CBS	18	Miami.....	127	18	14.17%
25	WCKT	NBC	18	Miami.....	102	12	11.76%
63	WPLG	ABC	18	Miami.....	105	9	8.57%
28	WBAL	NBC	19	Baltimore.....	114	13	11.40%
92	WMAR	CBS	19	Baltimore.....	100	6	6.00%
94	WJZ	ABC	19	Baltimore.....	86	5	5.81%
39	WKRC	ABC	20	Cincinnati.....	57	6	10.53%
101	WLWT	NBC	20	Cincinnati.....	134	7	5.22%
116	WCPO	CBS	20	Cincinnati.....	103	4	3.88%
81	WTMJ	NBC	21	Milwaukee.....	105	7	6.67%
110	WITI	ABC	21	Milwaukee.....	95	4	4.21%
140	WISN	CBS	21	Milwaukee.....	78	1	1.28%
66	WHNB	NBC	22	Hartford-New Haven.....	54	4	7.41%
79	WTIC	CBS	22	Hartford-New Haven.....	112	8	6.72%
88	WTNH	ABC	22	Hartford-New Haven.....	65	4	6.15%
76	KCMO	CBS	23	Kansas City.....	59	4	6.78%
89	KMBC	ABC	23	Kansas City.....	82	5	6.10%
115	WDAF	NBC	23	Kansas City.....	51	2	3.92%
54	WFLA	NBC	24	Tampa-St. Petersburg.....	82	7	8.54%
128	WTVT	CBS	24	Tampa-St. Petersburg.....	92	3	3.26%
136	WLCY	ABC	24	Tampa-St. Petersburg.....	52	1	1.92%
68	WCR	NBC	25	Buffalo.....	55	4	7.27%

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Rank	Call letters	Net. aff.	Mkt. No.	Location	High pay posi- tions	High pay minorities employed	
						Number	Percent
93	WKBW	ABC	25	Buffalo.....	67	4	5.97%
106	WBEN	CBS	25	Buffalo.....	103	5	4.85%
67	KQW	NBC	26	Portland.....	96	7	7.29%
117	KOIN	CBS	26	Portland.....	78	3	3.85%
119	KATU	ABC	26	Portland.....	79	3	3.80%
44	KOVR	ABC	27	Sacramento-Stockton.....	83	8	9.64%
46	KXTV	CBS	27	Sacramento-Stockton.....	66	6	9.09%
74	KCRA	NBC	27	Sacramento-Stockton.....	101	7	6.93%
8	WLWC	NBC	28	Columbus.....	73	11	15.07%
29	WTVN	ABC	28	Columbus.....	62	7	11.29%
103	WBNS	CBS	28	Columbus.....	96	5	5.10%
7	WREC	CBS	29	Memphis.....	52	8	15.38%
10	WHBQ	ABC	29	Memphis.....	61	9	14.75%
33	WMC	NBC	29	Memphis.....	64	7	10.94%
22	WSIX	ABC	30	Nashville.....	58	7	12.07%
102	WSM	NBC	30	Nashville.....	97	5	5.15%
114	WLAC	CBS	30	Nashville.....	76	3	3.96%
9	WVUE	ABC	31	New Orleans.....	74	11	14.86%
61	WWL	CBS	31	New Orleans.....	88	7	7.95%
126	WDSU	NBC	31	New Orleans.....	89	3	3.37%
69	KBTU	ABC	32	Denver.....	83	6	7.23%
95	KMGH	CBS	32	Denver.....	88	5	5.68%
107	KOA	NBC	32	Denver.....	60	3	4.55%
78	WSAZ	NBC	33	Charleston-Huntingto.....	59	4	6.78%
133	WCBS	CBS	33	Charleston-Huntingto.....	44	1	2.27%
145	WFTN	ABC	33	Charleston-Huntingto.....	36	0	0.00%
77	WPR	CBS	34	Providence.....	59	4	6.78%
118	WJAR	NBC	34	Providence.....	78	3	3.85%
123	WTEV	ABC	34	Providence.....	56	2	3.57%
47	WSOC	NBC	35	Charlotte.....	78	7	8.97%
57	WBTV	CBS	35	Charlotte.....	109	9	8.26%
104	WCCB	ABC	35	Charlotte.....	76	1	5.00%
113	WAVE	NBC	36	Louisville.....	76	3	3.95%
121	WHAS	CBS	36	Louisville.....	83	3	3.61%
130	WLKY	ABC	36	Louisville.....	37	1	2.70%
66	WAST	ABC	37	Albany-Schenectady-T.....	53	4	7.55%
83	WTEN	CBS	37	Albany-Schenectady-T.....	61	4	6.56%
143	WRGB	NBC	37	Albany-Schenectady-T.....	64	0	0.00%
20	WBMG	CBS	38	Birmingham.....	24	3	12.50%
72	WBRC	ABC	38	Birmingham.....	56	4	7.14%
132	WAPI	NBC	38	Birmingham.....	40	1	2.50%
43	WHIO	CBS	39	Dayton.....	82	8	9.76%
131	WLWD	NBC	39	Dayton.....	75	2	2.67%
23	WLOS	ABC	40	Gville-Sptnbg-Ashvl.....	58	2	12.07%
49	WFBC	NBC	40	Gville-Sptnbg-Ashvl.....	45	4	8.89%
142	WSPA	CBS	40	Gville-Sptnbg-Ashvl.....	45	0	0.00%
111	WZZM	ABC	41	Kalamazoo-Gr Rapids.....	48	2	4.17%
122	WOTV	NBC	41	Kalamazoo-Gr Rapids.....	83	3	3.61%
147	WKZO	CBS	41	Kalamazoo-Gr Rapids.....	51	0	0.00%
42	KOCO	ABC	41	Oklahoma City.....	59	6	10.17%
82	KWTU	CBS	41	Oklahoma City.....	60	4	6.67%
127	WKY	NBC	41	Oklahoma City.....	90	3	3.33%
56	WNYS	ABC	43	Syracuse.....	48	4	8.33%
98	WSYR	NBC	43	Syracuse.....	75	4	5.33%
109	WHEN	CBS	43	Syracuse.....	45	2	4.44%
32	WTAR	CBS	44	Nor-Newp News-Hamp.....	82	9	10.98%
40	WAVY	NBC	44	Nor-Newp News-Hamp.....	58	6	10.34%
135	WVEC	ABC	44	Nor-Newp News-Hamp.....	47	1	2.13%
35	KOOL	CBS	45	Phoenix.....	83	9	10.84%
73	KTVK	ABC	45	Phoenix.....	56	4	7.14%
99	KTAR	NBC	45	Phoenix.....	75	4	5.33%
4	KENS	CBS	45	San Antonio.....	57	12	21.05%
16	WOAI	NBC	45	San Antonio.....	64	12	18.75%
108	WSPD	NBC	45	San Antonio.....	60	8	13.33%
125	WTOL	CBS	45	Toledo.....	67	3	4.48%
129	WDHO	ABC	45	Toledo.....	59	2	3.39%
38	WGHP	ABC	45	Toledo.....	33	1	3.03%
71	WFMY	CBS	48	Gnsb-High Pt-Win Sal.....	57	6	10.53%
112	WXII	NBC	48	Gnsb-High Pt-Win Sal.....	70	5	7.14%
41	KGTU	NBC	48	Gnsb-High Pt-Win Sal.....	73	3	4.11%
59	KFMB	CBS	49	San Diego.....	98	10	10.20%
124	KCPX	ABC	49	San Diego.....	87	7	8.05%
141	KSL	CBS	50	Salt Lake City.....	58	2	3.45%
144	KUTV	NBC	50	Salt Lake City.....	101	1	0.99%
			50	Salt Lake City.....	62	0	0.00%

Network Affiliates Ranked by Percent Women Employed in High Pay Positions

Rank	Call letters	Net. aff.	Mkt. No.	Location	High pay positions	High pay women employed	
						Number	Percent
13	WCBS	CBS	1	New York City.....	181	20	11.05%
17	WNBC	NBC	1	New York City.....	179	19	10.61%
65	WABC	ABC	1	New York City.....	138	9	6.52%
6	KABC	ABC	2	Los Angeles.....	162	21	12.96%
38	KNBC	NBC	2	Los Angeles.....	174	15	8.62%
72	KNXT	CBS	2	Los Angeles.....	238	15	6.30%
25	WLS	ABC	3	Chicago.....	211	19	9.00%
33	WBBM	CBS	3	Chicago.....	236	20	8.47%
41	WMAQ	NBC	3	Chicago.....	56	14	25.00%
1	WCAU	CBS	4	Philadelphia.....	121	9	7.44%
51	WPVI	ABC	4	Philadelphia.....	159	10	6.29%
70	KYW	NBC	5	Detroit.....	181	19	10.50%
18	WXYZ	ABC	5	Detroit.....	129	5	3.88%
109	WWJ	NBC	5	Detroit.....	138	3	2.17%
132	WJBK	CBS	5	Detroit.....	131	13	9.92%
24	WBZ	NBC	6	Boston.....	132	5	3.79%
112	WNAC	CBS	6	Boston.....	135	10	6.43%
67	WKYC	NBC	7	Cleveland.....	115	3	2.61%
128	WJW	CBS	7	Cleveland.....	116	2	1.72%
138	WEWS	ABC	7	Cleveland.....	189	17	8.99%
34	KGO	ABC	8	San Francisco.....	110	8	7.27%
53	KPIX	CBS	8	San Francisco.....	165	11	6.67%
63	KRON	NBC	9	Pittsburgh.....	120	12	10.00%
22	WHC	NBC	9	Pittsburgh.....	103	5	4.85%
93	WTAE	ABC	9	Pittsburgh.....	107	3	2.80%
125	KDKA	CBS	9	Pittsburgh.....	128	21	16.41%
2	WMAL	ABC	10	Washington D.C.....	111	15	13.51%
3	WTOP	CBS	10	Washington D.C.....	170	11	6.47%
66	WRC	NBC	10	Washington D.C.....	148	13	8.78%
37	WFAA	ABC	11	Dallas-Fort Worth.....	105	8	7.62%
49	KDFW	CBS	11	Dallas-Fort Worth.....	112	5	4.46%
100	WBAP	NBC	11	Dallas-Fort Worth.....	110	10	9.09%
32	KMOX	CBS	12	St. Louis.....	94	5	5.32%
83	KSD	NBC	12	St. Louis.....	83	1	1.20%
46	KTVI	ABC	12	St. Louis.....	162	15	9.26%
29	WCCO	CBS	13	Minneapolis-St. Paul.....	48	4	8.33%
13	KMSP	ABC	13	Minneapolis-St. Paul.....	119	7	5.88%
73	KSTP	NBC	13	Minneapolis-St. Paul.....	66	8	12.12%
8	WLWI	ABC	14	Indianapolis.....	64	6	9.38%
28	WISH	CBS	14	Indianapolis.....	97	8	8.25%
44	WRTV	NBC	14	Indianapolis.....	73	4	5.33%
82	KHOV	CBS	15	Houston.....	73	3	4.00%
106	KTRK	ABC	15	Houston.....	102	4	3.92%
107	KPRC	NBC	15	Houston.....	132	13	11.36%
10	KOMO	ABC	16	Seattle-Tacoma.....	112	10	8.93%
45	KING	NBC	16	Seattle-Tacoma.....	94	3	3.19%
122	KIRO	CBS	16	Seattle-Tacoma.....	80	8	10.00%
23	WQXI	ABC	17	Atlanta.....	104	6	5.77%
74	WSB	NBC	17	Atlanta.....	109	3	2.75%
126	WAGA	CBS	17	Atlanta.....	127	14	11.02%
14	WTVJ	CBS	18	Miami.....	105	11	10.48%
19	WPLG	ABC	18	Miami.....	102	8	7.84%
47	WCKT	NBC	18	Miami.....	114	8	7.02%
56	WBAL	NBC	19	Baltimore.....	86	6	6.98%
57	WIZ	ABC	19	Baltimore.....	100	4	4.00%
108	WMAR	CBS	19	Baltimore.....	57	3	5.26%
80	WKRC	ABC	20	Cincinnati.....	134	7	5.22%
87	WLWT	NBC	20	Cincinnati.....	103	4	3.88%
108	WCPO	CBS	20	Cincinnati.....	95	6	6.32%
69	WITI	ABC	21	Milwaukee.....	105	6	5.71%
76	WIMI	NBC	21	Milwaukee.....	78	4	5.13%
90	WISN	CBS	21	Milwaukee.....	119	10	8.40%
42	WTIC	CBS	22	Hartford-New Haven.....	54	3	5.56%
78	WHNB	NBC	22	Hartford-New Haven.....	63	1	1.54%
101	WTNH	ABC	22	Hartford-New Haven.....	82	11	13.41%
5	KMBC	ABC	23	Kansas City.....	51	1	1.96%
135	WDAT	NBC	23	Kansas City.....	59	1	1.69%
140	KCMO	CBS	23	Kansas City.....	82	3	3.66%
113	WFLA	NBC	24	Tampa-St. Petersburg.....	92	3	3.26%
121	WTVT	CBS	25	Tampa-St. Petersburg.....	52	1	1.92%
137	WLCY	ABC	24	Tampa-St. Petersburg.....	55	3	5.45%
79	WGR	NBC	25	Buffalo.....	67	2	2.99%
123	WKBW	ABC	25	Buffalo.....	103	2	1.94%
136	WBEN	CBS	25	Buffalo.....	79	5	6.33%
68	KATU	ABC	26	Portland.....	96	5	5.21%
88	KGW	NBC	26	Portland.....	78	4	5.13%
89	KOIN	CBS	26	Portland.....			

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Rank	Call letters	Net. aff.	Mkt. No.	Location	High pay positions	High pay women employed	
						Number	Percent
50	KXTV	CBS	27	Sacramento-Stockton	66	5	7.58%
124	KCRA	NBC	27	Sacramento-Stockton	105	3	2.97%
131	KOVR	ABC	27	Sacramento-Stockton	83	2	2.41%
27	WLWC	NBC	28	Columbus	73	7	9.59%
45	WBNS	CBS	28	Columbus	98	8	8.16%
46	WTVN	ABC	28	Columbus	62	5	8.06%
96	WMC	NBC	29	Memphis	64	3	4.69%
111	WREC	CBS	29	Memphis	52	2	3.85%
119	WHBO	ABC	29	Memphis	61	2	3.28%
9	WSIX	ABC	30	Nashville	58	7	12.07%
54	WSM	NBC	30	Nashville	97	7	7.22%
85	WLAC	CBS	30	Nashville	76	4	5.26%
15	WVUE	ABC	31	New Orleans	74	8	10.81%
77	WDSU	NBC	31	New Orleans	89	5	5.62%
99	WWL	CBS	31	New Orleans	88	4	4.55%
71	KOA	NBC	32	Denver	66	4	6.06%
95	KBTU	ABC	32	Denver	83	4	4.82%
98	KMGH	CBS	32	Denver	88	4	4.55%
12	WHTN	ABC	33	Charleston-Huntingto	36	4	11.11%
60	WCHS	CBS	33	Charleston-Huntingto	44	3	6.82%
139	WSAZ	NBC	33	Charleston-Huntingto	59	1	1.69%
80	WTEV	ABC	34	Providence	56	3	5.36%
91	WPRI	CBS	34	Providence	59	3	5.08%
144	WJAR	NBC	34	Providence	78	1	1.28%
21	WCCB	ABC	35	Charlotte	20	2	10.00%
52	WBTB	CBS	35	Charlotte	109	8	7.34%
110	WSOC	NBC	35	Charlotte	78	3	3.85%
4	WLKY	ABC	36	Louisville	37	5	13.51%
127	WAYE	NBC	36	Louisville	76	2	2.63%
130	WHAS	CBS	36	Louisville	83	2	2.41%
11	WAST	ABC	37	Albany-Schenectady-T	53	6	11.32%
97	WRGB	NBC	37	Albany-Schenectady-T	64	3	4.69%
120	WTEN	CBS	37	Albany-Schenectady-T	61	2	3.28%
55	WBRC	ABC	38	Birmingham	56	4	7.14%
103	WBMG	CBS	38	Birmingham	21	1	4.76%
129	WAPI	NBC	38	Birmingham	40	1	2.50%
81	WLWD	NBC	39	Dayton	75	1	1.33%
114	WHIO	CBS	39	Dayton	82	3	3.66%
36	WFBC	NBC	40	Greenville-Spartanburg- Asheville	45	4	8.89%
59	WLOS	ABC	40	Greenville-Spartanburg- Asheville	58	4	6.90%
101	WSPA	CBS	40	Greenville-Spartanburg- Asheville	45	2	4.44%
133	WZZM	ABC	41	Kalamazoo-Gr Rapids	48	1	2.08%
134	WKZO	CBS	41	Kalamazoo-Gr Rapids	51	1	1.96%
145	WOTV	NBC	41	Kalamazoo-Gr Rapids	83	1	1.20%
61	KWTV	CBS	41	Oklahoma City	60	4	6.67%
117	KOCO	ABC	41	Oklahoma City	59	2	3.39%
118	WKY	NBC	41	Oklahoma City	90	5	5.56%
64	WHEN	CBS	43	Syracuse	45	3	6.67%
102	WNYS	ABC	43	Syracuse	48	2	4.17%
143	WSYR	NBC	43	Syracuse	75	1	1.33%
39	WTAR	CBS	44	Norfolk-Newport News- Hampton	82	7	8.54%
49	WVEC	ABC	44	Norfolk-Newport News- Hampton	47	4	8.51%
58	WAVY	NBC	44	Norfolk-Newport News- Hampton	58	4	6.90%
16	KTVK	ABC	45	Phoenix	56	6	10.71%
62	KTAR	NBC	45	Phoenix	75	5	6.67%
115	KOOL	CBS	45	Phoenix	83	3	3.61%
48	KSAT	ABC	45	San Antonio	64	5	7.81%
84	KENS	CBS	45	San Antonio	57	3	5.26%
92	WOAI	NBC	45	San Antonio	60	3	5.00%
20	WTOL	CBS	45	Toledo	59	6	10.17%
31	WDHO	ABC	45	Toledo	33	3	9.09%
142	WSPD	NBC	45	Toledo	67	1	1.49%
7	WGHP	ABC	48	Greensboro-High Point- Winston Salem	57	7	12.28%
26	WXII	NBC	48	Greensboro-High Point- Winston Salem	73	7	9.59%
75	WFMY	CBS	48	Greensboro-High Point- Winston Salem	70	4	5.71%
39	KFMB	CBS	49	San Diego	87	8	9.20%
104	KGTU	NBC	49	San Diego	98	4	4.08%
94	KUTV	NBC	50	Salt Lake City	62	3	4.84%
116	KCPX	ABC	50	Salt Lake City	58	2	3.45%
147	KSL	CBS	50	Salt Lake City	101	0	0.0%

APPENDIX D

THE TEN BEST AND TEN WORST STATIONS

In this Appendix are listed the ten best and ten worst stations in each area of programming and employment. The nine tables in Section 1 list stations entitled to special recognition for their outstanding performances. The stations in the nine tables in Section 2 should be singled out for their abysmally low performances.

1. THE TEN BEST

a. The ten best stations in overall programming ranking are:

Rank	Call sign	Channel	Affiliation	City
1.....	KPIX-TV	5	CBS	San Francisco
2.....	WJZ-TV	13	ABC	Baltimore
3.....	KING-TV	5	NBC	Seattle-Tacoma
4.....	KDKA-TV	2	CBS	Pittsburgh
5.....	KYW-TV	3	NBC	Philadelphia
6.....	WPLG-TV	10	ABC	Miami
7.....	WMAL-TV	7	ABC	Washington, D.C.
8.....	WTAE-TV	4	ABC	Pittsburgh
9.....	WFMY-TV	2	CBS	Greensboro-High Point-Winston Salem
10.....	KGW-TV	8	NBC	Portland

b. The ten best stations in News-Public Affairs-"Other" programming are:

Rank	Call sign	Channel	Affiliation	City
1.....	WPLG-TV	10	ABC	Miami
2.....	WMAQ-TV	5	NBC	Chicago
3.....	KNBC-TV	4	NBC	Los Angeles
4.....	WCBS-TV	2	CBS	New York City
5.....	WAGA-TV	5	CBS	Atlanta
6.....	KDKA-TV	2	CBS	Pittsburgh
7.....	KYW-TV	3	NBC	Philadelphia
8.....	KNXT-TV	2	CBS	Los Angeles
9.....	WCAU-TV	10	CBS	Philadelphia
10.....	WTOP-TV	9	CBS	Washington, D.C.

c. The ten best stations in (lack of) Commercial Matter Concentration are:

Rank	Call sign	Channel	Affiliation	City
1.....	KPIX-TV	5	CBS	San Francisco
2.....	WFMY-TV	2	CBS	Greensboro-High Point-Winston Salem
3.....	WPRV-TV	12	CBS	Providence
4.....	WJZ-TV	13	ABC	Baltimore
5.....	WTIC-TV	3	ABC	Hartford-New Haven
6.....	KING-TV	5	NBC	Seattle-Tacoma
7.....	WDHO-TV	24	ABC	Toledo
8.....	WNYS-TV	9	ABC	Syracuse
9.....	WAST-TV	13	ABC	Albany-Schenectady-Troy
10.....	WTAE-TV	4	ABC	Pittsburgh

d. The ten best stations in Local Programming are:

Rank	Call sign	Channel	Affiliation	City
1.....	WLWT-TV	5	NBC	Cincinnati
2.....	KYW-TV	3	NBC	Philadelphia
3.....	KNBC-TV	4	NBC	Los Angeles
4.....	KDKA-TV	2	CBS	Pittsburgh
5.....	WSB-TV	2	NBC	Atlanta
6.....	WJZ-TV	13	ABC	Baltimore
7.....	WWL-TV	4	CBS	New Orleans
8.....	KTAR-TV	12	NBC	Phoenix
9.....	WWJ-TV	4	NBC	Detroit
10.....	WPLG-TV	10	ABC	Miami

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e. The ten best stations in the percentage of Revenues used for Program Expenses are:

Rank	Call sign	Channel	Affiliation	City
1.....	WABC-TV	7	ABC	New York
2.....	KGW-TV	3	NBC	Portland
3.....	KING-TV	5	NBC	Seattle-Tacoma
4.....	WAST-TV	13	ABC	Albany-Schenectady-Troy
5.....	KOVR-TV	13	ABC	Sacramento-Stockton
6.....	KSL-TV	5	CBS	Salt Lake City
7.....	WRC-TV	4	NBC	Washington, D.C.
8.....	WHIC-TV	11	NBC	Pittsburgh
9.....	WMAL-TV	7	ABC	Washington, D.C.
10.....	WSYR-TV	3	NBC	Syracuse

f. The ten best stations in the Number of Public Service Announcements presented are:

Rank	Call sign	Channel	Affiliation	City
1.....	WKY-TV	4	NBC	Oklahoma City
2.....	WJZ-TV	13	ABC	Baltimore
3.....	KYW-TV	3	NBC	Philadelphia
4.....	WLY-TV	10	ABC	Tampa-St. Petersburg
5.....	KOIN-TV	6	CBS	Portland
6.....	WTVT-TV	13	CBS	Tampa-St. Petersburg
7.....	WJAR-TV	10	NBC	Providence
8.....	KWTV-TV	9	CBS	Oklahoma City
9.....	KDKA-TV	2	CBS	Pittsburgh
10.....	WPVI-TV	6	ABC	Philadelphia

g. The ten best stations in Minority Employment are:

Rank	Call sign	Channel	Affiliation	City
1.....	WTEV-TV	6	ABC	Providence
2.....	WNYS-TV	9	ABC	Syracuse
3.....	WPRI-TV	12	CBS	Providence
4.....	WBZ-TV	4	NBC	Boston
5.....	WSAZ-TV	3	NBC	Charleston-Huntington
6.....	KING-TV	5	NBC	Seattle-Tacoma
7.....	KGW-TV	8	NBC	Portland
8.....	WHTN-TV	13	ABC	Charleston-Huntington
9.....	WHEN-TV	3	CBS	Syracuse
10.....	WCHS-TV	8	CBS	Charleston-Huntington

h. The ten best stations in Minority High Pay Employment are:

Rank	Call sign	Channel	Affiliation	City
1.....	KABC-TV	7	ABC	Los Angeles
2.....	KENS-TV	5	CBS	San Antonio
3.....	KGO-TV	7	ABC	San Francisco
4.....	KSAT-TV	12	ABC	San Antonio
5.....	KNBC-TV	4	NBC	Los Angeles
6.....	WRC-TV	4	NBC	Washington, D.C.
7.....	WREC-TV	3	CBS	Memphis
8.....	WLWC-TV	4	NBC	Columbus
9.....	WVUE-TV	8	ABC	New Orleans
10.....	WHBQ-TV	13	ABC	Memphis

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i. The ten best stations in the High Pay Employment of Women are:

Rank	Call sign	Channel	Affiliation	City
1.	WCAU-TV	10	CBS	Philadelphia
2.	WMAL-TV	7	ABC	Washington, D.C.
3.	WTOP-TV	9	CBS	Washington, D.C.
4.	WLKY-TV	32	ABC	Louisville
5.	KMBC-TV	9	ABC	Kansas City
6.	KABC-TV	7	ABC	Los Angeles
7.	WGHP-TV	8	ABC	Greensboro-High Point-Winston-Salem
8.	WLWL-TV	13	ABC	Indianapolis
9.	WSIX-TV	8	ABC	Nashville
10.	KOMO-TV	4	ABC	Seattle-Tacoma

2. THE TEN WORST

a. The ten worst stations in the overall programming ranking are:

Rank	Call sign	Channel	Affiliation	City
135.	KMBC-TV	9	ABC	Kansas City
136.	WTVN-TV	6	ABC	Columbus
137.	WVEC-TV	13	ABC	Norfolk-Newport News-Hampton
138.	WKZO-TV	3	CBS	Kalamazoo-Grand Rapids
139.	WBMG-TV	42	CBS	Birmingham
140.	KOOL-TV	10	CBS	Phoenix
141.	WHBQ-TV	13	ABC	Memphis
142.	KBTU-TV	9	ABC	Denver
143.	WQXI-TV	11	ABC	Atlanta
144.	WCCB-TV	18	ABC	Charlotte

b. The ten worst stations in News-Public Affairs-"Other" programming are:

Rank	Call sign	Channel	Affiliation	City
135.	WVEC-TV	13	ABC	Norfolk-Newport News-Hampton
136.	KCPX-TV	4	ABC	Salt Lake City
137.	WLOS-TV	13	ABC	Greensboro-Spartanburg-Asheville
138.	WKRC-TV	12	ABC	Cincinnati
139.	WHBQ-TV	13	ABC	Memphis
140.	KTVL-TV	2	ABC	St. Louis
141.	KMSP-TV	9	ABC	Minneapolis-St. Paul
142.	WLKY-TV	32	ABC	Louisville
143.	WNYX-TV	9	ABC	Syracuse
144.	WDHO-TV	24	ABC	Toledo

c. The ten worst stations in overcommercialization are:

Rank	Call sign	Channel	Affiliation	City
135.	WHIO-TV	7	CBS	Dayton
136.	KFMB-TV	8	CBS	San Diego
137.	WLWD-TV	2	NBC	Dayton
138.	KNBC-TV	4	NBC	Los Angeles
139.	WCCO-TV	4	CBS	Minneapolis-St. Paul
140.	KOOL-TV	10	CBS	Phoenix
141.	WBBM-TV	2	CBS	Chicago
142.	KBTU-TV	9	ABC	Denver
143.	WLS-TV	7	ABC	Chicago
144.	WDAF-TV	4	NBC	Kansas City

d. The ten worst stations in Local Programming are:

Rank	Call sign	Channel	Affiliation	City
135	WAST-TV	13	ABC	Albany-Schenectady-Troy
136	WLKY-TV	32	ABC	Louisville
137	WVEC-TV	13	ABC	Norfolk-Newport News-Hampton
138	WHBQ-TV	13	ABC	Memphis
139	WDHO-TV	24	ABC	Toledo
140	WPTN-TV	13	ABC	Charleston-Huntington
141	WGR-TV	2	NBC	Buffalo
142	KCPX-TV	4	ABC	Salt Lake City
143	KLOS-TV	13	ABC	Greenville-Spartanburg-Asheville
144	WNYS-TV	9	ABC	Syracuse

e. The ten worst stations in the Percentage of Revenues used for Program Expenses are:

Rank	Call sign	Channel	Affiliation	City
135	WISH-TV	8	CBS	Indianapolis
136	WTHB-TV	30	NBC	Hartford-New Haven
137	WCCB-TV	18	ABC	Charlotte
138	WBZ-TV	4	NBC	Boston
139	WSAZ-TV	3	NBC	Charleston-Huntington
140	WCHS-TV	8	CBS	Charleston-Huntington
141	KDFW-TV	4	CBS	Dallas-Fort Worth
142	WKZO-TV	3	CBS	Kalamazoo-Grand Rapids
143	WBMG-TV	42	CBS	Birmingham
144	WBRC-TV	6	ABC	Birmingham

f. The ten worst stations in the Number of Public Service Announcements presented are:

Rank	Call sign	Channel	Affiliation	City
135	WTMJ-TV	4	NBC	Milwaukee
136	WDSU-TV	6	NBC	New Orleans
137	KTUL-TV	2	ABC	St. Louis
138	WSIX-TV	8	ABC	Nashville
139	WLAC-TV	5	CBS	Nashville
140	KIRO-TV	7	CBS	Seattle-Tacoma
141	WXYZ-TV	7	ABC	Detroit
142	WSM-TV	4	NBC	Nashville
143	WHIO-TV	7	CBS	Dayton
144	WHNB-TV	30	NBC	Hartford-New Haven

g. The ten worst stations in Minority Employment are:

Rank	Call sign	Channel	Affiliation	City
138	KOA-TV	4	NBC	Denver
139	WWL-TV	4	CBS	New Orleans
140	WLCY-TV	10	ABC	Tampa-St. Petersburg
141	WVEC-TV	13	ABC	Norfolk-Newport News-Hampton
142	WDHO-TV	24	ABC	Toledo
143	WAPI-TV	13	NBC	Birmingham
144	KUTV-TV	2	NBC	Salt Lake City
145	KSL-TV	5	CBS	Salt Lake City
146	KMSP-TV	13	ABC	Minneapolis-St. Paul
146	WKZO-TV	3	CBS	Kalamazoo-Grand Rapids

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h. The ten worst stations in Minority High Pay Employment are:

Rank	Call sign	Channel	Affiliation	City
138.....	KSTP-TV	5	NBC	Minneapolis-St. Paul
139.....	WLWI-TV	13	ABC	Indianapolis
140.....	WISN-TV	12	CBS	Milwaukee
141.....	KSL-TV	5	CBS	Salt Lake City
142.....	WSPA-TV	7	CBS	Greenville-Spartanburg-Asheville
142.....	WRGB-TV	6	NBC	Albany-Schenectady-Troy
142.....	KUTV-TV	2	NBC	Salt Lake City
142.....	WHTN-TV	13	ABC	Charleston-Huntington
142.....	KMSP-TV	9	ABC	Minneapolis-St. Paul
142.....	WKZO-TV	3	CBS	Kalamazoo-Grand Rapids

i. The ten worst stations in High Pay Employment of Women are:

Rank	Call sign	Channel	Affiliation	City
138.....	WEWS-TV	5	ABC	Cleveland
139.....	WSAZ-TV	3	NBC	Charleston-Huntington
139.....	KCMO-TV	5	CBS	Kansas City
141.....	WTNH-TV	8	ABC	Hartford-New Haven
142.....	WSPD-TV	13	NBC	Toledo
143.....	WSYR-TV	3	NBC	Syracuse
144.....	WJAR-TV	10	NBC	Providence
145.....	WOTV-TV	3	NBC	Kalamazoo-Grand Rapids
145.....	KTVI-TV	2	ABC	St. Louis
147.....	KSL-TV	5	CBS	Salt Lake City

APPENDIX E

SETTING RECOMMENDED AND MINIMUM LEVELS OF PERFORMANCE

There are certain recommended levels of performance which we have concluded every network-affiliated television station in the top 50 markets should strive to meet. Recommended levels do not necessarily reflect the most desirable performance, but merely the level of performance above which a station can be said to be giving an acceptable level of attention to the "public interest, convenience and necessity."

On the other hand, there are certain minimal levels below which no station should be allowed to fall. These minimums do not reflect desirable levels of performance, but rather levels which have arbitrarily been depressed to such a point as to permit the majority of the stations to meet them. Any station not meeting *these* levels is taking a risk, in our judgment, of license renewal challenge or adverse FCC action at some point in the future.

You will note that certain of these standards are expressed as percentages. Since the Chapter 1 programming analysis was based on hours and minutes, we have determined the number of stations meeting the percentage standards by applying the percentage to an average composite week of 135 hours.

	Minimum levels of performance	Number of stations meeting minimum	Recommended levels of performance	Number of stations meeting recommended
Total of News, Public Affairs and "Other" Programming (%).....	15%	127	20%	91
Public Service Announcements (number).....	150	111	200	71
(in addition, at least 50% of a station's psas should be of a local nature)				
Commercialization (number of 60 minute segments with more than 12 minutes of commercials).....	40	97	20	10
Local Programming (%).....	10%	67	15%	6
Total Minority Employment—while we recognize the undesirable aspects of a "quota" system for employment of minorities, we feel a good balance should be maintained between the percent of minorities employed and the percent of minorities in the SMSA, for total employment and high pay employment alike. Just 36 stations employed a total percentage of minorities equal to or greater than the percentage of minorities in the SMSA, and only three stations met that standard for high pay employment.				
Employment of Women—The employment of women in high pay positions should at least correspond to the percentage of women in the workforce in the SMSA. Unfortunately, this data was not available to us. However, no station employed women in numbers equivalent to the 35% presence of women in the national workforce.				

APPENDIX F
THE TOP FIFTY MARKETS

1. TOP 50 MARKETS LISTED BY MARKET SIZE

Market Number:	Market name
1.....	New York City
2.....	Los Angeles
3.....	Chicago
4.....	Philadelphia
5.....	Detroit
6.....	Boston
7.....	Cleveland
8.....	San Francisco
9.....	Pittsburgh
10.....	Washington, D.C.
11.....	Dallas-Fort Worth
12.....	St. Louis
13.....	Minneapolis-St. Paul
14.....	Indianapolis
15.....	Houston
16.....	Seattle-Tacoma
17.....	Atlanta
18.....	Miami
19.....	Baltimore
20.....	Cincinnati
21.....	Milwaukee
22.....	Hartford-New Haven
23.....	Kansas City
24.....	Tampa-St. Petersburg
25.....	Buffalo
26.....	Portland
27.....	Sacramento-Stockton
28.....	Columbus
29.....	Memphis
30.....	Nashville
31.....	New Orleans
32.....	Denver
33.....	Charleston-Huntington
34.....	Providence
35.....	Charlotte
36.....	Louisville
37.....	Albany-Schenectady-Troy
38.....	Birmingham
39.....	Dayton
40.....	Greenville-Spartanburg-Asheville
41.....	Kalamazoo-Grand Rapids
42.....	Oklahoma City
43.....	Syracuse
44.....	Norfolk-Newport News-Hampton
45.....	Phoenix
46.....	San Antonio
47.....	Toledo
48.....	Greensboro-High Point-Winston Salem
49.....	San Diego
50.....	Salt Lake City

2. TOP 50 MARKETS LISTED ALPHABETICALLY

Market Number:	Market name
37.....	Albany-Schenectady-Troy
17.....	Atlanta
19.....	Baltimore
38.....	Birmingham
6.....	Boston
25.....	Buffalo
33.....	Charleston-Huntington
35.....	Charlotte, N.C.
3.....	Chicago
20.....	Cincinnati
7.....	Cleveland
28.....	Columbus, Ohio
11.....	Dallas-Ft. Worth
39.....	Dayton
22.....	Denver
5.....	Detroit
41.....	Grand Rapids-Kalamazoo
48.....	Greensboro-Winston Salem-High Point
40.....	Greenville-Spartanburg-Asheville
22.....	Hartford-New Haven
15.....	Houston
14.....	Indianapolis
23.....	Kansas City
2.....	Los Angeles
36.....	Louisville
29.....	Memphis
18.....	Miami
21.....	Milwaukee
13.....	Minneapolis-St. Paul
30.....	Nashville
31.....	New Orleans
1.....	New York
44.....	Norfolk-Portsmouth-Newport News-Hampton
41.....	Oklahoma City
4.....	Philadelphia
45.....	Phoenix
9.....	Pittsburgh
26.....	Portland, Oregon
34.....	Providence
27.....	Sacramento-Stockton
12.....	St. Louis
50.....	Salt Lake City
45.....	San Antonio
49.....	San Diego
8.....	San Francisco
16.....	Seattle-Tacoma
43.....	Syracuse
24.....	Tampa-St. Petersburg
45.....	Toledo
10.....	Washington, D.C.